



## **Woking Local Development Documents**

**Site Allocations Development Plan Document (DPD) –**

**Officer summary and response to  
'Land to the east of Martyrs Lane' consultation**

September 2018



**Produced by the Planning Policy Team  
For further information please contact:  
Planning Policy Team, Woking Borough Council, Civic Offices, Gloucester Square,  
Woking, Surrey, GU21 6YL.  
Tel: 01483 743871. Email: [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk)**

As part of the Land to the east of Martyrs Lane consultation process, the Planning Policy Team has published the representations received during the consultation on its website. Please visit [www.woking2027.info/allocations](http://www.woking2027.info/allocations) to view the original representations. It should be noted that personal and sensitive information such as personal email addresses and telephone numbers have been removed.

All of the representations received during the consultation period have been summarised by officers and responded to. To locate the officer's summary and response to your representation, please see the contents list on the following pages. This has been set out in alphabetical order by surname. Any representations received containing no surname are listed at the end of the list.

A number of the officer summaries and responses refer to other Council documents. These documents can be found online and include:

- Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper
- Regulation 18 consultation Issues and Matters Topic Paper
- Duty to Cooperate Bodies Topic Paper
- Land to the east of Martyrs Lane Consultation Document
- Sustainability Appraisal

For quick reference, Table 1 below sets out the representations received from statutory consultees and other key stakeholders and organisations, including landowners within the Martyrs Lane site boundary.

**Table 1: Statutory consultees and other key stakeholders and organisations.**

<b>Surname / Organisation</b>	<b>Page Number</b>	<b>Consultee Type</b>
Amanda Downham	4117	Land Owner
Amanda Downham	4461	Land Owner
Anthony's Resident Association	909	Community Group
Antony Shephard	4067	Land Owner
Bell Cornwell	2677	Developer/Agent
Benedict Watt	4027	Land Owner
Burhill Group Ltd	1140	Developer/Agent
Byfleet, West Byfleet And Pyrford Resident Association	2686	Community Group
Catherine Watt	4556	Land Owner
Cliff Powell	4146	Land Owner
CPRE	491	Organisation
D Boodia	4581	Land Owner
Elmbridge Borough Council	1970	Local Authority
Environment Agency	107	Statutory Consultee
Gladman Developments Limited	858	Developer/Agent
Graham Foat	1983	Land Owner
Guildford Borough Council	2764	Local Authority
Highways England	2664	Key stakeholder
Hook Heath Residents Association	1750	Community Group
Horsell Common Preservation Society	956	Land Owner
Horsell Common Preservation Society	3929	Land Owner
Jo Ryder	1564	Land Owner
Lisa Hammond	182	Land Owner
M Y Foat	1408	Land Owner
M Y Foat	2563	Land Owner
M Y Foat	3274	Land Owner
Margaret Mary Shephard	4068	Land Owner
Martin Grant Homes	109	Developer/Agent
Matthew Ryder	1554	Land Owner
Mayford Village Society	429	Community Group

<b>Surname / Organisation</b>	<b>Page Number</b>	<b>Consultee Type</b>
McLaren Technologies Group LTD	113	Land Owner
Mr Boodia	4291	Land Owner
National Grid	1641	Key stakeholder
Natural England	4132	Statutory Consultee
New Zealand Golf Club	1153	Land Owner
Pyrford Green Belt Action Group	667	Community Group
Pyrford Neighbourhood Forum	496	Neighbourhood Forum
Richard Thompson	1332	Land Owner
Richard Wyld	2781	Land Owner
Runnymede Borough Council	661	Local Authority
Simon Eaton	4727	Land Owner
Sport England	413	Key stakeholder
Steven Downham	4116	Land Owner
Surrey County Council – Spatial Planning Team	108	Local Authority/Land Owner
Surrey County Council Archaeology	3257	Local Authority
Surrey Heath Borough Council	2078	Local Authority
Surrey Wildlife Trust	1220	Key stakeholder
Taylor Wimpey UK Ltd	945	Developer/Agent
Thames Water Planning and Property	4373	Key stakeholder
The Woodland Trust	1984	Key stakeholder
Thomas Roberts Westminster Limited	3888	Developer/Agent
UK Power Networks	3259	Key stakeholder
Vail Williams	145	Developer/Agent
Waverley Borough Council	1129	Local Authority
West Estates Ltd	117	Developer/Agent
Woking Constituency Labour Party	3275	Political Group
Woodham And Horsell Neighbourhood Forum	1544	Community Group
Woodham And Horsell Neighbourhood Forum	4702	Community Group
Worplesdon Parish Council	3438	Parish Council

## All representors to the 'Land to the East of Martyrs Lane' consultation

Name	Surname / Organisation	Page Number
Saad	Abdul-Rassak	2105
Herbert C	Abela	2577
Uche	Achebe	95
Uche	Achebe	298
Yonah	Acosta	3087
Ian	Adam	2693
Michael	Adams	2032
Alastair	Adams	2269
Anthony	Adams	4078
Les	Adcock	4580
Tracy	Addis	4000
Jagruti	Adhiya	2755
Sachin	Adhiya	3544
Shankoof	Afiq	2788
Vajahat	Ahmad	3304
John	Aird	2350
Jean	Aish	2552
Simon	Akers	3597
M H	Alder	1390
Richard	Alder	4258
Grant	Alderman	1355
Melanie	Alderman	2904
Royston	Alderman	2905
Ryan	Alderman	2907
Jacqueline	Alderton	3856
Christopher	Alderton	3860
Ruth	Aldis	2396
Nick	Aldis	2397
Wendy	Aldons	1692
David	Aldous	2567
Anthony	Aldred	2364
Andrea	Alestrand	4740
Sarah Elaine	Alexander	814
George	Alexander	4326
Cathy	Alexander	4327
Jon	Alexander	4328
Bob	Alexander	4330
	Alexander Family	4333
Peter	Alfred	3764
Marguerite	Alker	4179
F	Allali	1761
Aicha	Allali	1764
Aanisa	Allali-Williams	1762
Anna-Maria	Allan	3494
Andrew	Allan	4251
Alison	Allana	3155
Paul	Allard	1740

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Lucy	Allard	3283
Roger	Allen	1041
Heather	Allen	1236
Christine	Allen	3293
Giles	Allington	680
D	Allum	2861
Vivienne	Amer	1953
Julliet	Amer	4334
Dr Sohail	Amer	4588
Valerie	Amos	2245
Christine	Anderson	3159
M	Anderson	3181
M	Anderson	3322
Mr	Anderson	3323
Caroline	Anderson	3692
David	Anderson	3693
Safia	Anderson	4164
Alex	Anderson	4165
Jenson	Anderson	4166
Siobhan	Anderson	4170
Pete	Anderson	4402
Siobhan	Anderson	4437
Jean	Anderson	4503
Roland	Anderson	4513
David	Anderson-Bassey	2046
Jaymie	Andrew	2610
Kenneth	Andrews	3395
N	Angus	4586
Amy	Anjum	4285
Hussain	Anjum	4661
G and P	Ankers	1056
Carolyn	Antel	3026
	Anthony's Resident Association	909
Constance	Appelbe	3615
Sonia	Appleby	4532
N	Apthorp	3043
Madi	Apthorpe	1833
John	Apthorpe	1844
Ferdinand	Aragon	4426
Nick	Arbin	3797
Jane	Archer	3633
Ian	Arden	3973
Lindsey	Arden	4018
S M	Argent	420
Julie	Argent	3459
Jane	Armitage	702
Keith	Armstrong	824
Maureen	Arnett	1103

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Grahame	Arnold	2911
Henry	Arthur	3299
D	Arundale	3495
David	Ashdown	3143
Jeanne	Ashdown	4579
Christopher	Ashdown	4589
Alec	Ashley	1817
Joan	Ashley	3844
Bill	Ashpitel	133
David J	Askew	967
David	Askew	2321
Joseph	Assheton	3202
John	Athersuch	2744
Diane	Atkins	3224
Caz	Atthill	3476
John	Attrill	2176
Susan	Austin	2257
Wes	Austin	2547
Paul	Austin	3085
Janet	Ayers	3086
Caroline	Ayres	1348
Andrew	Ayres	2916
Georgia	Ayres	4484
Rosalind	Ayres	4485
Peter	Bach	4599
Emmanuel	Bach	4641
Jenny	Bach	4642
Teresa	Bacon	875
Jon	Badman	1819
Nadia	Badman	1820
R	Bagley	312
Janet	Bagley	1811
Tracy	Bagnall	2061
Linda	Bagnall	2517
Jeremy	Bailes	3406
J	Bailey	342
Dennis	Bailey	728
Simon	Bailey	1678
David	Bailey	1947
Julianne	Bailey	2602
Gwen	Bailey	3853
David	Baker	47
Carole	Baker	2006
Patricia And Michael	Baker	2036
Graham	Baker	2087
Marisa	Baker	3111
Andrew	Baker	3454
Mr and Mrs	Baker	3578

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Clive	Baker	3875
Marisa	Baker	4562
Simon	Baker	4684
Samantha	Ball	3660
Pippa	Ballam	1241
Simon	Baluch-Jenkins	3908
Rosemary	Banks	4521
Matthew	Barac	2712
Simon	Barber	637
Hjon	Barber	1360
J	Barber	1961
Steve	Barber	2981
M	Barber	3089
Neil And Hanna	Barclay	1296
Graham	Barclay	3217
Michelle	Barker	4700
Barbara	Barklem	1367
Stephen	Barklem	2459
Julie	Barlow	2589
Julie	Barlow	2621
Lionel	Barnes	1075
Pat	Barnes	1423
Andrew	Barnes	2099
Julien	Barnes	3168
Cindy	Barnes	3398
Peter	Barnes	4163
Andrew	Barnes	4268
Pip	Barnes	4753
Josh	Barnett	3428
Jo	Barnett	3469
Stephen J	Barney	463
Nick And Susan	Barney	3727
M	Barr	3317
Philip	Barr	4217
Chris	Barrett	1459
Belinda	Barrett	1582
Helen	Barrett	2470
D G	Barrett	3699
I L	Barrett	3700
Brian	Barrow	4737
Jacquie	Barry	1775
Gerrard	Barry	1776
Nichola	Barry	1777
Joanne	Barry	2888
Guy	Barry	2889
Martin And Shirley	Bartley	3482
Martin and Shirley	Bartley	4522
Martin and Shirley	Bartley	4648

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Neil	Bateman	3215
Jennifer	Bater	4346
Colin	Bater	4347
Steve	Battams	2701
Barbara	Baty	3828
Brian	Baty	3863
Leon	Bayero	4071
Alec And Catherine	Beattie	561
E	Beddoe	3055
Chrissie	Beddows	2209
Michael	Beehag	3688
Michael	Beehag	3708
Frank	Beken	3480
Stuart	Belcher	3815
Fiona	Bell	868
David	Bell	2082
Anne	Bell	3508
	Bell Cornwell	2677
Samantha	Bellanca	2284
Joe	Bellanca	2286
Samantha	Bellanca	2288
Peter Anthony	Bellion	1069
Ilsa	Bellion	2603
James	Belso	4543
Paula	Belso	4546
Michelle	Beman	1952
John	Benbow	4536
Ray	Benbow	4539
Sue	Benbow	4540
J	Bendell	2859
Marian	Bendle	870
Clare	Benham	766
Michaela	Benham	2751
Patrick	Bennett	913
Joanne	Bennett	2456
Michael	Bennett	3838
Richard	Bennett	4187
Brett	Benson	4548
Kim	Bent	3325
Kim	Bent	4410
Debbie	Bentley	4498
Daniel	Berry	3829
Mr and Mrs	Berville	2264
Rosemary	Beynon	244
Vic	Bhayro	1839
Vanessa	Biancardi	4382
Mario	Biancardi	4448
Carol	Biancardi	4449

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
A M	Bidwell	2890
Alison	Biggs	2200
John	Bigham	3933
Helena	Bigham	4651
David	Billig	3795
Julianne	Birch	2266
Phil	Birch	2267
Andrea	Bird	2855
Carol Elizabeth	Birk	1161
Graham	Bisacre	4264
Jean	Bisacre	4301
David	Bish	793
Kath	Bish	796
John	Bishop	2529
Margaret	Bishop	2533
James	Bishop	2731
Carole	Blackburn	68
Giles	Blackham	1789
Giles	Blackham	1835
Katie	Blackham	4542
Caroline	Blackney	4671
Karen	Blackwell	1139
Marisa	Blagden	2455
Bernard	Blake	332
Barbara	Blake	2663
K	Blake	2690
Victor	Blanchard	3932
Georgia Natasha	Blanco–Litchfield	3386
Charles	Blane	4064
Ernest	Blattmann	1838
Jeremy	Blayney	4643
Richard A	Bligh	2812
Victoria	Blissett	258
Jonathan	Blissett	267
Naida	Blower	4136
Jon	Blundell	1585
Miriam	Blunden	3571
Eloise	Blyth	2507
Lisa	Bobrowski	300
Paul	Boddy	2997
Jean	Boffee	382
Mark G	Boffee	540
Cliff J	Bolton	753
Yvette	Bolton	880
Janet	Bolton	3957
Jane	Bond	1252
Simon	Bond	3896
S	Bonito	322

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Mr	Boodia	4291
D	Boodia	4581
Steve	Boon	2298
Susan	Boon	2300
David	Boorman	2414
Carol	Borghia	4313
Paul	Borrett	3136
J C	Borrham	4371
Renato	Bortoli	3586
Tina	Bose	4216
Kiron	Bose	4288
Sarah	Bounds	2772
Toni	Bowater	4312
Richard	Bowden	3429
Alwyn	Bowen	4636
David	Bower	2909
Richard And Tara	Bowling	2109
J P	Bowman	4097
Martin	Bowman	4173
Tony And Mary	Box	4341
Len	Boyce	3717
Nicola	Boyd	4229
Fergus	Boyd	4246
Margaret	Boyde	4436
Esme	Boylett	3788
Jane	Boylett	3817
Chris	Boylett	4203
Jonny	Boylett	4249
Barbara	Boyse	1035
Vanessa	Brace	4204
John	Bradbury	1967
John	Bradbury	2448
Katharine	Bradley	2627
Grace	Bradshaw	3359
Margaret	Brady	2468
Guy	Braithwaite	3345
Anna	Brak	1255
Diane	Bramley	4156
Ronald	Brandman	1626
Suzanne	Brannan	3306
Ron	Brans	4634
Rhoda	Breakell	4383
Simon	Breakell	4384
Roger	Breeden	2937
Sharin	Brew	3329
Roy	Brewer	1892
Jacky	Brewer	4519
Anthony	Brewer	4570

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
T	Brewer	4689
Stephen	Brialey	3674
David	Bridger	4302
David M	Brighton	2233
David M	Brighton	3775
Angela	Brightwell	2791
Matt	Brill	1905
Peter	Brodribb	3036
Dolly	Brodribb	3342
Elna	Broe	1964
Mark	Bromley	3609
Dean	Brook	2596
C	Brooke	2696
Jane	Brooker	3000
Robert	Brookes	2641
Henrietta	Brooks	932
Albert	Brooks	3403
Joan	Brooks	3404
Karen	Brooks	3405
Donna	Broom	3799
Michelle	Brown	1351
N Douglas And Adrienne S	Brown	1536
Molly	Brown	1574
Chris	Brown	2466
Malcolm	Brown	2483
Matthew	Brown	3154
Stacey	Brown	3367
Susan	Brown	3579
Chris	Brown	3624
Ian	Brown	3934
Gari	Brown	3962
Clare	Brown	3983
Julie	Brown	3988
Linda	Brown	4029
Michael	Brown	4271
Christopher	Browne	2718
Kate	Browne	3012
Andrew	Brundle	3724
Bill	Bruno	4144
Bill	Bruno	4677
C	Brunton-Green	3613
John	Bryant	3176
Pam	Bryant	3183
Maurice	Buckingham	3108
Alan	Buckland	1712
Alison	Buckland	1719
Ellen	Buckland	1724
Mark	Buckley	3903

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Steven And Lynn	Bull	2184
George Wayne	Bull	3694
Karen	Bullett	3565
Sarah	Bulman	4516
David	Bumstead	3402
D D	Bunce	167
	Burhill Group Ltd	1140
David	Burke	3032
Alan	Burt	2865
Maria	Burt	2866
Chloe	Burt	2867
Perry	Burton	3953
Mark	Busby	1696
Elizabeth	Busby	3065
Elwyn Trevor	Busby	3115
Roy	Butcher	1595
Jennifer	Butcher	4675
Marcia	Butler	2724
Janette	Butler	3289
Sheila	Butler	3634
Bernadette	Butler	3667
Justine	Butler	4590
Shaun	Butler	4633
Nigel P	Butt	707
Helen	Butt	2711
Clare	Butters	4506
Eric	Butterworth	2107
	Byfleet, West Byfleet And Pyrford Resident Association	2686
Emily	Byrne	3623
Caroline	Cackett	1518
Jo	Caffry	3698
Mike	Cage	1121
Peter	Cameron	624
Jane	Cameron	3573
Brian	Cameron	3611
Anne	Camp	4279
Jo	Campbell	2205
Fran	Campbell	2816
Sophie	Campion	3505
Dawn	Campion	3587
Ivor	Canavan	3122
Robert	Candey	2518
Tony	Canning	1362
Judith	Canty	1884
Tim	Canty	2984
Piers	Capper	3243
Melanie	Capper	3244

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Ben	Carasco	846
Stephen	Cardis	3759
Stephen	Carlile	1704
Zoe	Carlin	933
Chris	Carlin	2710
D A	Carlsson	2650
Susan	Carolin	968
John	Carolin	1047
Colin	Carr	4009
C	Carroll	3481
Peter James	Carroll	3483
Simon	Carter	1521
Donald	Carter	3945
Frances	Carter	3946
Christopher Paul	Carter	4457
Jo	Caruth	281
Holly	Case	4219
Denise	Cassar	3232
Angela	Cassidy	3146
Susan	Cast	2813
H	Castell	3019
Leon	Caszo	926
Jill	Cater	3301
Robert	Catt	1866
Richard	Cawthorne	2985
Martyn	Cayless	3477
Fiona	Cefai	2464
Dan	Cefai	3883
Christopher	Chalkley	4380
Daniel	Chalkley	4385
Marcia	Chalkley	4386
Stephen	Chalkley	4387
Harry	Chambers	2537
Marnie	Chambers	2634
Sally	Champion	4450
Claire	Chandler	625
Priscilla	Chandro	2060
Barbara	Chapman	1450
Jane	Chapman	3348
David	Chappell	4111
Godfrey H	Chapples	2782
Bob	Charrett	3655
Clare	Charrett	3861
Carol	Chase	3689
Hilary	Cheetham	853
Jonathan	Cheney	2737
Alice	Cherry	3465
Julia	Cherry	4143

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Kerry	Chessell	3600
John B	Chester	2031
Susan	Chester	3840
Tim	Chetwood	4172
Philippa	Cheung	3701
Ian	Chevalier	2658
Denis And Kathleen	Chia	817
Peter	Chiverton	2886
Andrew	Choules	4560
Dr Martin	Christie	2919
Terry	Chubb	1619
Julie	Clack	3369
Mark	Clare	4276
Peter	Claridge	2698
Sabine	Clark	28
John	Clark	201
Melanie	Clark	1680
Anthony	Clark	3522
Linda	Clarke	3041
Janet	Clarke	4171
Linda	Clarke	4319
K R	Clarke	4712
Beryl	Clavey	4718
Clare	Claxton	3785
Nick	Claxton	3786
Amy	Claydon	4654
Chris	Claydon	4656
Jo	Clayton	1621
J A	Clements	566
Mark	Clements	3216
Katrina	Clements	3248
Ineke	Clewer	3590
Philip	Cliff	4214
Suzanne	Cliff	4242
Kathryn	Cliffe	301
Samantha	Clifton	609
Helen	Clothier	4692
Richard	Clutterbuck	3501
Joanne	Coady	1968
Jonathan	Coady	1969
P	Coatworth	535
Amrat	Cobb	3373
David And Sarah	Cockburn	1322
Nick	Cockburn	1988
John R	Cockerill	3794
Mary B	Cockerill	3796
Tim	Cockrill	256
John	Cockrill	2569

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Janet	Cockrill	2573
Debra	Cohen	1530
Phil	Coleman	655
Lisa	Coleman	1836
Robin	Coleman	2523
Anne	Coleman	3602
M J	Coles	4372
John	Collingwood	3537
Wendy	Collins	1511
Katie	Collins	1531
Stewart	Collins	2024
Miriam	Collins	2050
Michael	Collins	3549
A	Collis	4481
Ronald	Colvin	367
Cathy	Comber	715
Kevin	Compton	3675
Manuel	Conde	2047
Richard	Condon	2539
Diane	Condon	2540
Anthony	Condon	2541
Gregory	Conlon	3917
Laura	Conn	2795
H S	Conway	915
Janet	Conway	3589
J A R	Cook	1897
Lesley	Cook	2045
Ronald	Cook	2413
Marie	Cook	2512
Penny	Cook	2525
Sarah	Cook	4663
Michael	Cooke	1854
H K	Cooke	1869
Deirdre	Cooke	2038
Robert	Cooke	2058
John	Cooke	4478
Steven	Cookson	4298
J	Cooper	449
Jennifer	Cooper	556
Dennis	Cooper	557
Darren	Cooper	1887
Peter	Cooper	2590
Valerie	Cooper	2591
Jane	Cooper	3584
Sharon	Cooper	4145
David	Copeland	3564
Ann	Corbett	1957
Graeme	Corbett	3219

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Joanne	Corkill	1347
Barbara	Cormie	178
Vernon and Jill	Cornell	3767
Andrew	Cornwell	3984
Michael D	Cosgrove	1966
Colleen	Costa	3129
John	Costs	2187
Jonathan	Cottam	3939
Jonathan	Cottam	4598
David	Cottle	4710
John	Cotton	61
Alex	Couch	1120
Peter	Coulthard	40
Caroline	Coulthard	299
David	Coupe	4550
Maurice	Court	2469
D	Court	4766
Bronwen	Cousins	2615
Ron	Cowan	2691
Sharon	Cowan	2692
Kerri	Cowan	2999
Karina	Cowan	3460
Leanne	Cowcroft	1349
Bob	Cowell	4413
Mary	Cowell	4424
Sylvia	Cox	2820
Alan	Coy	3357
Paul	Cozens	1935
Lynn	Cozens	2578
(Tim Harrold)	CPRE	491
Kate	Craddock	3133
Marie	Craig	1993
Marie	Craig	4407
Peter	Cramp	3678
Kim	Crane	3458
Dr David	Crees	3223
Dr David	Crees	3280
Charlie	Cripps	3291
N	Critche	3051
Tracie	Critchell	3355
Ian	Crockford	1831
Carole	Croft	2725
Julia	Crompton	2835
Maria	Croome	2389
Colin	Cross	1593
Clare	Cross	2403
Rosalind	Cross	4501
James	Crotty	3806

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Yoko	Crow	3455
David	Crowder	1921
Richard	Crowe	3371
Jean	Crowle	1398
Stephanie	Crowther	2173
Richard	Crowther	3899
Susan	Croxford	2295
Ruth	Cruickshank	2352
James	Cruse	2208
Neil	Cryer	1782
Patricia	Cryer	4463
Peter	Cullis	4420
Trevor	Cullum	1000
Anthony	Cummins	3376
Anthony	Cummins	3377
Michael	Cumper	4308
David	Cumper	4401
Val	Cunningham	3676
Tom	Currie	2798
Simon	Curry	1292
Judy And Victor	Curtis	160
Christine E	Curtis	3063
Mary	Cuttle	3911
Geoffrey	Cuttle	3928
Stephanie	Cutts	3807
Rozia	Da Silva	2493
Albert	Da Silva	2549
Andre	Da Silva Goncalves	3538
Sue	Dackham	613
Chris	Dackham	614
Zoe	Dackham	615
Leonie	Dackham	616
Steven	Daley	2374
Dario	Daloia	3941
Terry	Daly	3831
Rose	Dams	2640
Louise	Dams	2807
Andy	Dams	4739
Jovita	Dams	4741
Sorcha	Dando	558
Michael	Daniels	2335
Barry	Daniels	2868
E	D'Arienzo	4724
Floriano	DaSilva	3310
E	Dault	3092
Matthew	Davey	3354
Rubina	Davidian	2597
Richard	Davidson	1932

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Steve	Davies	2196
Frances	Davies	2206
Lyndsey	Davies	2474
Helen	Davies	2717
Eddie	Davies	2848
M	Davies	3052
Gareth	Davies	3706
Stephen	Davies	3882
Ian	Davies	4080
Clare	Davies	4278
Carole	Davis	189
Bryony	Davis	470
Richard	Davis	1167
Crystal	Davis	3996
Charlotte	Davis	4602
Hilary	Davison	3610
Jo	Davison	3736
Hilary	Davison	3762
Ron	Dawes	1977
Pauline	Dawson	2699
Gary	Dawson	2700
Shelia	Day	2057
Robert	Day	3870
Kevin	De Cruz	4412
Paul	De Kock	4206
Pauline	De Marco	2236
E	De Montfort	3054
Janet	Deacon	2775
Richard	Deacon	3144
Allen	Dean	3190
Joyce	Debanks	2356
Lorraine	Dell	3748
Terry	Dell	3821
Nicola	Dempsey	3653
Hilary	Dennett	15
Gordon	Denney	1787
Jackie	Denney	2495
Rebecca	Denny	51
Carol	Dent	3363
Kevin	Dent	4577
Tammy	Dexter	2822
Robyn	Dexter	3385
Anita	Dexter	3449
Tammy	Dexter	4705
A	Dicker	3826
Domenico	Digilio	1976
Julie	Dimes	3020
Paul	Dinmore	3049

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Paul	Dinmore	4076
B	Diton	3533
Julie	Dixon	3619
Karl	Dixon	3621
Christine	Dixon	4517
Brian	Dodd	1796
Anthony	Dodge	3221
Gill	Dodgin	2388
Adrian	Doe	4377
Sam	Doherty	3079
Sam	Doherty	4726
R	Dolton	2852
Ian	Donaldson	2157
Jason	Doran	3618
Shelley	Doran	3652
Sue	Doree	3343
Sheila	Dorkings	2424
Jacquelyn	Douch	3333
John And Jackie	Douch	3380
Paul	Dougan	3518
John	Douglas	4469
Kate	Douglas	4665
Maria	Dovey	2304
Henny	Dovland	3810
J R	Dowdeswell	3067
David	Dowling	4685
David	Dowling	4686
Alex	Downham	4038
Vicky	Downham	4057
James	Downham	4058
Steven	Downham	4116
Amanda	Downham	4117
Amanda	Downham	4461
Angela	Doyle	585
Martin	Doyle	639
Mike	Doyle	3418
Michael	Dragoyevich	3382
Mark	Draisey	1365
Martyn	Drake	4063
Julie	Drake	4477
S A	Drew	1412
	Drummond	3064
Liz	Drummond	4417
Dawn	Dryburgh	2279
Andrew	Drysdale	4730
N C R	Duffield	3334
Agnieszka	Duffin	2826
Cecil	Duguid	3069

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Francesca	Duke	927
Sarah	Duncan	630
Fiona	Duncan	2075
J P M	Duncan	3279
Colin	Duncan	3793
B	Dunkley	2516
Anthony	Dunn	2873
Killian	Dunne	3457
Juliet	Dunsmuir	632
Melvyn	Dunstall	3230
Sarah	Dunstall	3231
Chris	Dunstan	832
Fiona	Dunstan	837
Lynette	Dwyer	2766
Lynette	Dwyer	2833
Nicholas	Dyer	2993
Nick	Dyer	2994
Nicholas	Dyer	3004
M	Dymond	3100
Nancy	Eales	3125
David	Earl	1814
Robert	East	3574
Kathy	Eastgate	3679
Nigel	Eastment	4148
John	Eastwood	2749
D	Eastwood	3191
Chris	Eastwood	3935
Simon	Eaton	4727
Rachel	Eddershaw	2740
S A	Edwardes	4369
Lucy	Edwards	2197
Linda	Edwards	2349
Poppy	Edwards	2353
Waheeda	Edwards	2887
Patricia	Edwards	4764
Elizabeth	Egginton	2735
Chrissie	Eggleton	2281
Debbie	Eke	2644
Yousra	El Badawi	3823
Douglas	Elbourn	848
Alexandra Clare	Elbourn	2123
Jenny	Eldridge	2912
Heidi	Eldridge	3728
T	Elfyn	3241
David And Marianne	Eliot	252
Nicholas	Eliot	1019
Sirfraz	Ellahi	2394
Graham And Margaret	Elliot	2375

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Karen	Elliott	2398
E H W	Elliott	2562
Nicola	Elliott	4025
David	Elliott	4209
	Elmbridge Borough Council	1970
Jo	Elphick	1124
William	Elsley	4336
Douglas	Elsley	4337
Gary	Elson	1906
David	Embury	1688
Anne	Emerson	1234
D	Emery	510
A	Emery	515
Jenny	Emery	2990
G And S	Emes	1746
Jennifer	Emrys-Roberts	4344
M	England	3022
(Judith Johnson)	Environment Agency	107
Joe	Ephgrave	2273
Rick	Erickson	619
C	Evans	2843
Rachel	Evans	2995
Rachel	Evans	2996
Rachel	Evans	3005
Anthony John	Evans	3581
Caroline	Evans	3744
Elaine	Evans	4244
Marianne	Evans	4447
Howard	Evans	4452
Sandra	Faccini	2268
Alan	Fahey	3425
Donald	Fairburn	2494
Robert	Fairless	3427
A	Fairlie	3312
Emma	Faithfull	2325
Eva	Faraji	2689
Kevin	Farquharson	1727
Helen	Faulds	3733
John	Fawcett	3766
Elaine	Fawdry	3545
Penny	Fazackerley	3630
Giovannia	Federico	2346
Peter	Ferguson	816
Mandy	Ferguson	3218
Amanda	Ferguson	4657
Nicola	Fernandez	3236
Liza	Fiddes	3249
Graham	Fidler	3029

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Sharon	Fidler	3117
Drummond	Field	4267
Amanda	Field	4270
Peter	Fingland	697
Nigel	Firth	4056
Frank	Fisher	3622
Laura	FitzPatrick	2862
David	FitzPatrick	2863
Grahame And Linda	Fleet	1506
V M	Fleet	3361
V M	Fleet	3490
Alan	Fleming	2086
Richard	Fleming	3491
Jennifer	Fletcher	4106
Roly	Fletcher	4109
Dan	Fletcher	4137
David	Flitcroft	3234
Ann	Florance	3410
Linda	Flory	2509
Graham	Flower	4317
M Y	Foat	1408
Graham	Foat	1983
M Y	Foat	2563
M Y	Foat	3274
B L	Fogg	2986
Garth	Foote	3292
Alex	Forbes	2290
T	Forbes	3920
Jane	Ford	1676
Ami	Ford	3534
Nick	Forde	869
D G	Fordham	2049
Oliver	Foreman	2770
Simon	Forrest	3368
Raymond A	Forrest	3375
Rory	Forsyth	1287
Rory	Forsyth	1377
Ken	Forsyth	1889
Lorna	Forsyth	2565
Lorna	Forsyth	2594
Fiona	Fortson	2914
John And Rosey	Foster	1244
Sally	Foster	3486
Martin	Foster	3524
Martin	Foster	3540
Ashleigh	Foster	3626
Philip	Foster	3703
John And Eliene	Fotheringham	777

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
S	Fowle	3066
Jenny	Fowler	1248
Mary Catherine	Fowler	4222
Derrick	Fowler	4224
Jenny	Fowler	4492
Ronald	Fowler	4493
Jane E	Foxon	3902
Sabrina	Fragassi	3792
Carl	Francis	4673
Michael And Jane	Franklin	3192
Holly	Franklin	4765
Heather	Fraser	638
Heather	Fraser	1409
Peter	Fraser	2463
Jan	Frederiksen	958
Keith	Free	2292
J	Free-Gore	3187
Patricia	Freeman-Cramp	3677
Emma	Freeth	2885
Carol	French	1359
Lisa	French	1520
Mark	French	4162
Ruth	Frewin	2636
Diane	Friend	3134
Keith	Froom	2222
Lucy	Fryett	3520
Samuel	Fudge	1535
Lewis	Fudge	4225
Helen	Fudge	4236
Jonathan	Fudge	4275
Linda	Futcher	3561
Arietta	Gaazenbeek	2423
Ivan	Gale	1130
Carole	Gale	1262
Emily	Gale	1703
Lesley	Galloway	3346
Malcolm	Gambold	2727
Mary	Gambold	2728
Geoffrey	Gandy	3910
Claire	Gant	2054
Peter And Elizabeth	Gardner	1717
Zoe	Gardner	1959
Kiri	Garner	610
Bruce	Garner	3562
Natasha	Garner	3563
Carolyn	Garnett	3430
John	Garnett	3492
Chris	Garratt	295

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Michael	Garrett	2386
Catherine	Garrett	2733
Sara	Garton	2832
Francesca	Gaskin	1602
Simon	Gaskin	1808
Milo	Gaster	2106
Margaret	Gates	2515
Chris	Gates	3038
E H	Gaydon	520
Geoff	Geaves	16
Yvonne	Geaves	96
Agnieszka	Geborek	2910
Harriet	Geis	4473
Joseph	Genco	4483
Rosemary	George	4218
Hayley	Gerhardt	3516
EJ	Ghisoni	3431
Rena And Joe	Giardina	1282
Patrick	Gibbon	3390
Andrew	Gibbs	3954
Adam	Gibson	3142
Bob And Gill	Giddings	2667
Susan	Gigg	761
Roy	Gigg	978
Nick	Gilchrist	3666
Vera	Giles	2167
Dr Penny	Gilham	3509
Tina	Gill	3614
M E	Gillard	2215
Phil And Maxine	Gilles	2198
Annie	Girotti	1763
Virginia	Girtz	3726
	Gladman Developments Limited	858
Ray	Glaister	2635
Shaun	Glanville	2977
Nicki	Glazzard	1364
Nicola	Glen	2817
Nicola	Glen	4646
Lesley	Godbolt	1928
Jeanette And Gary	Goddard	157
Chris	Goddard	291
Sue	Goddard	483
Neil	Godfrey	4321
Neville	Godwin	2815
Michelle	Godwin	4299
Sandra	Goldblatt	2554
Kate	Golding	2457
Helen	Golding	3753

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Clare	Goodberry	1461
Ben	Goodberry	1479
Frances	Goode	2189
Sandra	Goode	3620
Linda	Goodey	3179
Martin	Goodman	634
Nora	Goodman	878
Mark	Goodship	2587
Julianne	Goodsir	2623
Mark	Goodsir	2624
Lee	Goredema	3452
Grainne	Gormley	2599
Kristine	Gorton	2014
Jacy	Gorton	4743
Brett	Goslett	2461
Christine	Gough	1260
Edel	Govinden	3073
Emily	Govinden	3075
John	Gower	3057
Stephen	Grabham	2497
Colette	Grace	4042
Chris	Grace	4043
Colette	Grace	4050
Chris	Grace	4051
Thomas	Gracey	2802
Jacqueline	Gracey	2803
Alison	Graham	737
J	Graham	1352
Dan	Graham	2506
Christine	Graham	4434
Stewart	Graham	4490
Ursula	Grainger	4237
Katey	Grant	1588
Guy	Grant	1614
Alan	Grant	1636
Jackie	Grant	3189
Paula	Grant	3487
Katey	Grant	4093
Alison	Grant-Williams	4033
Peter	Graves	1607
Eleanor	Graves	2669
Peter	Graves	2938
Gail	Graves	2946
Peter	Graves	3897
Katy	Gravett	4118
Andrew	Gray	4235
Jennifer	Grayson	2077
Michael	Green	1312

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Paul	Green	2721
Robert	Green	3396
Peter	Green	4527
Lesley	Green	4566
Antony	Green	4721
Nick	Greenhouse	4664
Karen	Greenway	3489
Jim	Greer	4630
Dave	Gregory	2657
Breige	Grey	2544
Derek	Grice	4435
Pamela and Lionel	Griffin	2287
Raymond	Griffith	2460
Christine	Griffiths	921
T R	Griffiths	1179
Gerald	Griffiths	1642
Paul	Griffiths	2908
Andrew	Griffiths	3053
Neil	Griffiths	4081
Richard	Grimmett	4693
Andrew	Grimshaw	307
Richard	Grinter	4037
Lucy	Grivvell	1799
Simon	Grout	1653
Ann-Marie	Grout	1659
Beryl	Grout	3082
Peter	Grout	3109
Andy	Grout	4544
Jane	Groves	101
	Guildford Borough Council	2764
Kate	Gulliver	989
Kate	Gulliver	4694
Thomas	Gundacker	1345
Adam	Gunn	1372
H	Gurney	2524
Rafal	Gutaj	4074
Mark	Guthrie	4191
Nigel	Guy	13
Mary	Guyatt	2723
Steve	Gynn	3472
Ben	Hacking	4660
Simon	Hacking	4681
Chris	Hacking	4711
Rebecca	Haddow	4715
Matthew	Haigh	3572
Claire	Hale	1370
Ian	Hall	1852
Linda	Hall	2957

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Colin	Hall	2972
Andrew	Hall	4441
Dave	Hall	4696
D R	Hallett	3713
Jonathan	Halliday	1363
Anne	Halls	3752
Andrew	Halstead	3335
Peter	Hambrook	3670
Brian	Hames	3916
Fenella	Hames	3967
Imran	Hamid	1682
I	Hamid	1684
Brian	Hamill	3161
Brian	Hamill	4335
R I	Hamilton	444
Mark	Hamilton	623
Maria	Hamilton	2637
Pauline	Hamilton–Painting	2195
Ben	Hamilton–Power	4049
Michael And Gillian	Hamlyn	1433
Lisa	Hammond	182
Natalie	Hammond	3461
Derek	Hancock	3774
Tracey	Handle	3750
L	Hannell	71
A	Hannell	136
Diana	Hannon	3739
N	Harding	1971
Adam	Harding	2629
Suzanne	Harding	3145
Jack	Harding	3617
Denise	Harding	3835
Bianca	Hards	1524
Julia	Hardy	1116
Phil	Hardyman	4065
Carol	Hardyman	4075
Jane	Hargreaves	3284
B D	Harmer	2151
W	Harmer	3857
Jennifer	Harper	1128
Louise	Harper	1533
Audrey	Harris	26
R W	Harris	31
Scott	Harris	862
Glenn	Harris	2192
Derek T	Harris	2193
Ivy	Harris	2194
Melanie	Harris	2274

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Keith	Harris	2275
Ken	Harris	2530
Denise	Harris	3548
Alexandra	Harris	3979
Ann	Harris	4227
Taly	Harris	4658
Jacqueline	Harrison	1378
D	Harrison	1908
Teresa	Harrison	3186
Gina	Harrison	3738
Scott	Harrison	3958
J P	Harrop	3999
M E	Hart	25
Brian William	Hart	2534
Claire	Hart	3372
Nigel	Hart	4053
Michael	Hart	4349
Elaine	Hart	4354
Annette	Hart	4379
John	Hart	4508
Margaret	Hart	4509
Stephen	Hart	4607
Emily	Hart	4611
Jessica	Hart	4615
William	Hartley	1669
P T	Harvey	392
David	Harvey	1791
Caroline	Hassanein	3478
Jonathan	Hastings	659
Ruby	Hastings	1907
Glynis	Hatchwell	3502
Penelope	Hatsell	525
Marrie Claire	Hawke	3197
Emily	Hawkesworth	4306
Lawrence	Haworth	29
J M	Haworth	30
Kelly	Hayes	1276
Paul	Hayes	1283
Darren	Hayes	1523
Paul	Hayes	2505
Josh	Hayes	2662
Simon	Hayes	2742
Paul	Haygreen	4554
Diana	Haynes	2399
Nick	Haynes	2400
Anna	Haynes	3172
Nick	Haynes	3742
John	Haynes	3878

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Lynne	Haynes	4252
Jill	Hayter	3789
Carolyn	Hayter	3947
Brian	Hayter	3995
Gill	Head	2838
David	Head	3423
Tony	Healy	1837
Diana	Healy	3320
Suzanne	Heaney	2023
Susan	Heap	2719
C M	Heath	2933
Andrew	Heaton	211
Lynn	Heaton	217
Harry	Heaton	550
Katherine	Hedges	4315
Teddy	Heffer	2199
Noel	Hehir	3594
Nadine	Helling	3453
Nick	Hemmant	2425
Gina	Hemmant	2433
Muriel	Hemmings	1883
Susannah	Hemmings	3745
Carl	Henderson	2804
Debi	Henderson	3417
Mrs	Hennessy	3285
Bernard And Wendy	Hennessy	4059
Wendy	Hennessy	4622
Beryl	Hennessy	4728
Brett	Henry	1519
Angela	Henry	3777
Steve	Henshall	2104
Graham	Hepburn	3374
Samantha	Herbert	4422
Richard	Heron	3525
Ffiona	Hesketh	2370
Stacey	Hesketh	4604
Nigel	Heugh	635
Estelle	Hewett	2585
Elizabeth	Hewitt	1176
Kevin	Hewson	2390
Dave	Hickey	3103
Clare	Hickford	2900
Sharon	Hickman	3319
Jennifer	Higgins	617
Marilyn	Higham	928
Stephen	Higham	3269
Marilyn	Higham	3971
C	Highbury	3314

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
	Highways England	2664
Peter	Hill	905
John	Hill	1499
Peter	Hill	3188
Trevor	Hill	3855
Lisa	Hill	3925
Clare	Hillier	3915
Angela	Hinton	3414
Michael	Hipkins	2566
Lynda	Hirst	4086
Annabel	Hitchin	4307
Vic	Hitching	2600
Valerie	Hive	3710
Annie	Hlava	3408
Susan	Hobbs	1924
Clive and Delia	Hobbs	2213
Simon	Hobbs	2743
Carl	Hoddinott	621
Stewart	Hodges	1079
Matthew	Hodges	3709
Jamie	Hodges	3734
Allen	Hodkinson	1118
Angela	Hodkinson	1119
Melanie	Hodkisson	3193
Jenny	Hoff	4510
Daryl	Hogben	3808
Susan	Holden	4405
Joe	Holden	4419
Eddy	Holding	4595
Michelle	Hollas	3171
Tony	Hollingsbee	4175
James	Hollingsworth	2501
Chris and Veronica	Hollis	3370
Jo	Holloway	4438
Mike S	Holmberg	4367
S	Holmberg	4368
Robert	Holmes	2145
Peter	Holmes	3309
Alison	Holmes	3963
Rhian	Holmes	4282
Susan	Holtham	1532
M	Homampour	3124
Roland	Home	4168
Kelly	Homles	2756
	Hook Heath Residents Association	1750
E	Hopgood	3048
Meredith	Hopkins	1743
Brenda	Hopkins	2334

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
S	Hopkins	2622
April	Hopkins	2713
Tim	Hopkins	3313
Mandy	Hopkins	3471
Tim	Hopkins	3898
Evelyn	Hopkins	4340
Robert	Hopkins	4688
Ingrid	Hopson	2243
Margaret	Hornsby	1749
Margaret	Hornsby	2043
Nicole	Horsburgh	2847
	Horsell Common Preservation Society	956
	Horsell Common Preservation Society	3929
David	Horsnell	2338
Shirley	Horsnell	2339
Jacqueline	Horwell	3412
Stephen	Houghton	3407
Carolyn	Houghton	3635
Laura	Housden	3790
Nick	Housley	2613
William	Howard	3813
Nicola	Howard	4706
Peter	Howden	357
Alan	Howe	2853
Timothy	Howe	4569
Maggie	Howe	4695
Judi	Howell	3174
Charley	Howell	3175
Tracy	Howells	3321
Amanda	Hoyle	605
Robin	Hoyle	4537
Linda	Hucklesby	1771
Mike	Hudson	1845
Lisa	Hudson	2212
J C M	Hughes	607
Steve	Hughes	2708
Penelope	Hughes	2720
Christopher J	Hughes	2796
Shan	Hughes	3114
Steve	Hughes	3757
Russell	Hughes	4017
Alisa	Hughes	4147
Walter	Hulatt	3965
Gillian	Hulatt	3966
Reece	Humphreys	723
Leonora	Humphreys	892
Robert	Humphries	3339
Lisa	Hunnisett	1529

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Jamie	Hunt	1956
Keith	Hunt	2276
Alan And Sylvia	Hunt	4364
Lesley	Hunt	4678
Mark	Hunt	4679
Jan	Hunter	4014
Oliver	Huntley–Robertson	4396
Cllr Beryl	Hunwicks	3083
Alan	Hunwicks	4342
Cllr Beryl	Hunwicks	4431
Shereen	Hussein	1939
Neil	Hutchings	3558
Nick	Hutchins	2265
Anne	Hutchinson	2987
Mrs	Hutt	3909
Nigel	Hutton	2409
John	Hutton	4305
L E	Hyde	3229
Carol	Hyde	3556
Stuart	Hyde	3557
Sara	Hyland	3990
Christine	Iannelli	4731
Giuseppe	Iannelli	4732
Giuliano	Iannelli	4733
Isabella	Iannelli	4734
Giovanni	Iannelli	4735
Carmina	Iannelli	4736
Leo And Monica	Iles	4479
Hazel	Ingate	465
Norman	Ingate	2260
Jennifer	Ionides	1258
George	Ionides	1259
G	Irish	2508
P V	Irving	46
Mohamed	Ismail	1758
Peter	Izzard	2793
Irene	Izzard	3530
Gino	Izzi	2354
Alison	Jackson	225
Sue	Jackson	3696
Tony	Jacob	2410
Melanie	Jacques	4055
Eleanor	Jacques	4760
Celia	Jaffreys	2906
Peter	Jagger	2127
Hayley	Jakubait	3105
Sarah	Jakubait	3247
Julian	James	1374

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Karen	James	3068
John And Mary	James	3588
David	James	4028
Ray	James	4241
Sian	James	4494
Michelle	Jamieson	4108
Robert	Janson	1353
Jonathan	Jaques	3169
Isobel	Jarvis	206
Stuart	Jarvis	247
Cathy	Jarvis	473
R E	Jarvis	1288
Peter	Jefferis	4432
Harry	Jeffery	2391
Susanna	Jeffery	2408
Catherine	Jeffery	2496
Felicity	Jells	3194
Steve	Jenkins	3237
Adam	Jenkins	3397
H D	Jenkins	3735
Dr Robert	Jenkins	4230
Ewa	Jenkins	4231
Robert	Jewkes	1765
Sithambaram And J R	Jeyam	2326
Sharlene	Joannides	3961
Margaret And Maldwyn	John	4062
Sarah	Johns	3985
Norman	Johns	4160
Rev Dr Malcolm	Johnson	2272
Beckie	Johnson	3070
Penny	Johnson	3484
Lesley	Johnson	4243
L	Johnson	4339
Gordon	Johnston	2598
Dawn	Jolley	3541
E C	Jones	387
Richard	Jones	1185
Marian	Jones	1186
Ann	Jones	1375
Mark	Jones	1484
Julie	Jones	1522
Susan	Jones	1542
Alison	Jones	1594
Angela	Jones	1629
Ray	Jones	2079
Russell	Jones	2299
Neil	Jones	2337
Mark	Jones	2442

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Ogg	Jones	3094
Jason	Jones	3782
Sian	Jones	3822
Dorothy	Jones	4010
Lorna	Jones	4180
Alastair	Jones	4182
Brian	Jones	4345
Barbara	Jones	4400
Michael	Jones	4565
Daryl	Jordan	2416
Daryl	Jordan	2595
Quentin	Jordan	2702
Jenny	Jordan	2810
John	Jordan	3517
Ian	Joslin	2169
Paul	Judd	4325
Brian	Judson	1457
R	Jupp	327
Nick and Jan	Kamburoff	2417
Michael	Kane	3028
Samantha	Kassir	2485
Alex	Kay	2794
Susan	Keale	651
Mandy I	Keane	2678
Chan	Keaney	1541
Chan	Keaney	2242
Janet	Kearns	1689
CLlr Laurence	Keeley	4157
Michael	Keen	362
E	Keirnan	3031
Amanda	Kelly	3035
Clive	Kelly	3536
Marcella	Kelly	3566
Stephen	Kelly	3943
Jim	Kelly	4304
Jo	Kelly	4561
Linda	Kemeny	810
Patricia	Kemp	2053
Sam	Kendall	3927
Katherine	Kennedy	2458
Alexandra	Kenney	1624
Jeremy	Kenward	2467
Madeleine	Key	829
Stephen	Keyes	1304
Mohammed	Khan	735
J	Kibble	3034
Kay	Killen	3936
Gavin	Killen	3938

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Alice	Killen	3940
Will	Killen	3942
Craig	Kimber	3889
Linda	Kimber	4213
Andrew	Kimber	4240
Rachel	King	620
Mary	King	1317
Kay	King	2130
Richard	King	2625
Christine	King	3401
Tim	King	3426
Oliver	Kingham	2498
Charlotte	Kingham	2521
Martine	Kinsman	3546
Rosemary	Kirby	455
BJ	Kirby	459
Andrew	Kirby	571
Alison	Kirby	603
Albert	Kirby	2074
Alka	Kirby	2754
Alison	Kirby	4084
Rajesh	Kishan	1841
Robert	Knight	2271
Gerald	Knight	2983
Jennifer	Knight	3039
Marion	Knight	3510
Amy	Knight	3511
Margaret	Knight	3663
Terry	Knight	4631
Judith	Knott	2918
Mark, Linda, Max and Luke	Knowles	2261
Jane	Knowles	4752
Jean	Knox	2872
Alan	Krikorian	973
Lisa	Kuner	2903
Veronica	Lacey	3871
Kerry	Lacey	3992
Ian M	Lachowicz	575
Kim	Lafferty	2342
Graeme	Laing	4594
Geraldine	Laing	4707
Martin	Lake	2336
Hilary	Lakin	1687
Ian	Lamaison	683
Amy	Lambkin	1849
Amy	Lambkin	3071
Amy	Lambkin	3783
Anel	Lamine	3820

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Victor	Laming	4683
Dr Nick	Lance	4674
Hannah	Lane	2763
Tim	Lane	2787
Heather	Lane	3119
Gemma	Lane	4667
Simon	Lane	4668
Pauline	Langfield	4296
Tony	Langford	4322
David	Langton	4691
Sarah	Lardner	729
David	Larkin	4381
Philip	Larner	4433
Peggy	Last	3266
Julie	Last	4185
Helen	Latham	64
Paul	Latham	598
Catherine	Latham	627
S	Laukkanen	4747
Lucia	Laurent	2546
Cara	Lawler	2452
Mark	Lawn	2818
Kevin	Lawrance	618
Sharon	Lawrence	1240
Steve	Lawrence	1965
Elizabeth	Lawrence	2924
Richard S	Lawrence	3890
Steve	Lawrence	3891
Nick	Lawry	3707
Chris	Laws	4220
Dominic	Lawson	2405
Geoffrey Allan	Laycock	2499
A	Le Blanc	3139
Fiona	Le Brocq	4247
Diana	Lea	1399
Richard	Lea	2069
Carey	Leach	4462
Tom	Leader	899
Sylvia	Leahy	4167
Silvino	Leal	2745
Michael	Le'Bez	3442
Carol	Le'Bez	3446
D	Leddy	2884
Neville	Ledsome	3273
Warren	Lee	2183
Anne	Lee	2824
Colin	Lee	3235
An	Lee	4320

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Mike	Legg	1190
Vicki	Leggett	3964
Martin	Leigh	3818
P	Leigh	3819
Deborah	Leigh-Williams	2402
Chris	Lemon	2551
Michael	Lemon	3654
Amanda	Leonard	1685
Lisa	Leonard	4738
Dan	Letch	3504
Bryn	Lewis	1606
Pauline	Lewis	2545
Anne	Lewis	2695
Linda	Lewis	3443
Katen	Lewis	4287
Richard	Ley	1859
Steven	Lightman	2628
Terry	Lillington	2891
Colin	Lindsay	2282
Irene	Lindsay	2548
Jason	Lindsay	4430
Sylvia	Lindsay	4453
D	Ling	4260
D	Ling	4265
Jon	Litchfield	3222
Celia	Litchfield-Dunn	3081
Celia	Litchfield-Dunn	3102
Zoe	Little	2202
Andrew	Liven	3214
Lucinda	Lloyd	699
Stephen	Lloyd	843
Luke	Lloyd	844
Lucy	Lloyd	845
Melanie	Loades	1369
Chris	Loake	3282
Fiona	Lochhead	3989
Suzanne	Lock	2303
Terry	Lodge	2626
Sandra	Loeffler	2277
Judith	Loeffler	2357
Chrissie	Lomas	2652
Pam	Lomax	2962
Roy	Lomax	2967
Patrick	Lonergan	629
D G	Long	1913
Amanda	Long	3233
Bethan	Lopez	3315
Leticia	Lopez De Blundell	1601

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
John	Lord	2739
Patricia	Lord	3868
Freda	Loring	2830
Amanda	Lote	2550
Matt	Lothian	3892
Graham	Loughrey	2800
Len And Kristen	Louis	1731
Andrew	Love	3116
Barbara	Lovejoy	2251
Martin	Lovejoy	2254
Lauren	Low	2638
Beryl	Low	4362
Keith	Low	4363
Diane	Lowe	49
Reg	Lowe	50
Claire	Lowe	3353
Clive	Lowe	4600
David	Ludlow	3593
Dr Heike	Luecke	3118
Christian	Luecke	3195
Wendy	Lumsden	3002
J T	Lyddon	1960
J T	Lyddon	3997
Wendy	Lynam	3755
Derek	Lynch	3173
Marie	Lynch	3308
Charlotte	Lynn	3500
Deborah	Lynn	4196
Colin	Mabe	2715
Douglas	MacDonald	4411
Richard	Mace	2211
Jonathan	Machin	3751
Alexandra	MacInnes	2307
Angus	MacInnes	2314
Christiane	Mackie	129
John	Mackowski	4421
Jill	Macmillen	2654
Andy	Maddock	594
Maria	Maddox	3379
James	Maden	3199
Isabelle	Magnet	3177
Elizabeth	Maguire	2387
Amy	Maher	3812
Geetha	Maheshwaran	2355
Neil	Mahoney	4748
Alan	Maitland Smith	4391
Ian	Makowski	545
Ian	Makowski	2925

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Marion	Malcher	484
Andrew	Malcher	769
Joanne	Mallett	2611
Richard	Mallett	4563
Paul James	Malynn	2840
Eric	Mamet	3271
Chui	Man	38
Gerard And Margaret	Mandeville	1091
Sara	Mangold	4054
Stuart	Mannering	2748
Robert	Manning	1027
Vicki	Mans	4250
Thanya	Mansfield	1842
Mark	Mantell	4273
Natasha	Mantell	4323
James	March	4640
Caroline	March	4666
Catriona	Marchant	750
Ian	Marchant	1612
Brian	Marchant	3120
Laura	Marczewski	4690
Debbie	Margaroni	4744
Nicola	Marinero	3204
J	Markey	2757
Holger	Marsen	2453
Ian	Marshall	2422
Pauline	Marshall	2761
Tracey	Marshall	3340
Graham	Marshall	3834
Maureen	Marshall	3869
Susan	Martin	347
Judyth	Martin	636
Alison	Martin	1373
Matt	Martin	1613
Matt	Martin	3393
Ben	Martin	3722
	Martin Grant Homes	109
Ailsa	Masters	633
Lesley	Masters	1650
Sandra	Mathews	1127
Penny	Matthews	758
Tim R	Matthews	762
Joanne	Matthews	1437
Joanne	Matthews	1440
Chris	Matthews	1445
Val	Mattingley	3088
Dr Barry	Maunder	3297
Dr Christine	Maunder	3298

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Judith	Mawhood	2376
Hollie	May	3421
Sarah	May	3987
	Mayford Village Society	429
Hannah	Maynard	3737
Sarah	Maynard	3876
Karen	Maynard	3955
Marion	McAllister	1576
Shiela	McAree	4134
Derek	McCausland	2204
Carolyn	McCclean	1109
Anne	McCclean	1338
Jo	McClements	3547
Cerys	McCormack	3468
Mary	McCready	1417
Sue	McDonald	2901
Neil	McEvoy	2934
John	McGaffney	2522
Nicola	McGinnis	3712
Sarah	McGough	3780
Janette	McGuinness	1681
Lynne	McIntee	4446
Pamela	McIntosh	2988
J	McKay	7
Brian	McKendry	3439
Sue	McKeown	4284
John	McKeown	4286
James	McKie	3295
Monica	McKinnell	3560
	McLaren Technologies Group LTD	113
Ian	McLellan	890
Gillian	McLellan	897
Chris	McLoughlin	4701
Kieron	McMahon	2358
Nikki	McNeill	4578
Amy	McQuade	3598
Anna Marie	McSherry-Free	2293
Ian	McVeigh	4597
Richard	Meads	1126
Sue	Meads	1358
Nat	Meeajun	3164
Marianne	Meinke	3260
Brian	Meinke	3413
Marianne	Meinke	4119
Marianne	Meinke	4549
David	Melham	2582
David	Meller	3388
Eira	Meller	3409

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Pat	Meller	3420
Brian	Meller	3422
Eira	Meller	4763
Andrew	Mellett	4534
Carol	Mellor	1504
Nika	Melnikov	1286
Caroline	Mendham	1473
Nicholas	Mendham	1707
Richard	Mensa–Annan	3968
Joan	Mercier	4255
Patrick	Mercier	4256
David And Judith	Meredith	2110
Linsey	Meredith	2821
Paul	Merritt	33
Holly	Merritt	35
Penny	Merritt	931
Jane	Messenger	276
Steve	Messenger	3836
Steve	Messenger	4008
Audrey	Micallef	4502
Eve	Michaelis	4184
Marzena	Michalska	3680
Michal	Michalski	3681
Clive	Milam	3583
Yolande	Milborrow	1951
Paul	Miles	710
Lynette	Miller	44
Nigel	Miller	45
Nicholas	Miller	885
Guy	Miller	962
Keith	Miller	1239
Malcolm	Miller	1356
Catherine	Miller	3765
Richard	Miller	4245
Katherine	Miller	4263
Dr Kathy	Miller	4280
David	Miller	4329
Pamela	Miller	4403
Helene	Millou	2805
Ian	Mills	1059
Florence	Mills	1469
John	Mills	1528
Penny	Mills	4223
John	Mills	4558
A W	Milne	1425
Robin	Milner	1308
Aruna	Milson	3809
Luisa	Minter	1686

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Maryam	Mirghaemi	1942
Amanda	Mirrington	4077
Stewart	Mison	4125
Lyn	Mison	4149
Roger	Mitchell	1863
C	Mitchell	2185
David	Mitchell	3612
Sean	Mitchell	3921
Shea	Mitchell	4099
Erin	Mitchell	4100
Carole	Mitchell	4104
Ciaran	Mitchell	4113
Jean	Mitchell	4233
Martin	Mitchell	4324
Lisa	Mitchell	4587
Lisa	Mitchener	2558
John	Moffat	4316
Mr	Monst	3239
Marilyn	Montclare	1466
Ben	Montila	3209
Shirley	Moody	3743
Mr and Mrs	Moon	3686
Nick	Moore	1256
R O	Moore	1778
Ian	Moore	2451
Janet	Moore	2630
Robin I	Morgan	688
Helen	Morgan	690
David	Morgan	1702
Mary	Morgan	2488
Catherine	Morgan	3352
Victoria	Morgan	3416
Mary	Morgan	3485
Robin I	Morgan	3776
Jack	Morgan	3824
Camille	Morgan	4397
Vicki	Morganti	3078
Vicki	Morganti	4745
Yoshi	Mori	4635
Jillian	Morris	1517
John	Morris	2333
Wendy	Morris	2528
Charlotte	Morris	3037
Mark	Morris	3366
Jane	Morris	3948
Neill	Morrison	2000
Amanda	Morrison	4571
Molly	Morrissey	2332

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Carol	Morton	411
Sally	Moses	4135
Graham	Moss	3858
David	Moss	4482
H	Mottaghi	1903
A M	Moul	4497
John	Mould	3076
Juliet	Moulin	842
John	Muir Fraser	4253
Karen	Muldoon	2331
Sara	Mule	2864
Luigi	Mule	2892
Joseph	Mule	2893
Maria	Mule	2894
Gabriella	Mule	2895
Sarah	Mulhall	3603
Marc	Mulhall	3604
Raymond	Mulligan	1832
Lynne	Mullin	37
Lynne	Mullin	287
Jonathan	Mullin	2320
Jonathan	Mullin	2341
Wendy	Mullins	2240
India	Multani	3687
J	Mulvany	372
Michael	Mulvany	377
Patrick	Munday	4034
Frank	Mundy	1357
Paula	Mundy	1847
Robert	Munford	1917
Caroline	Murdoch	3949
Denise	Murfitt	3599
Peter	Murfitt	3601
Christine	Murphy	628
Karen	Murphy	3570
Sylvia	Murphy	4152
Graham	Murray	3058
Neill	Murrin	2263
Heather	Mustard	940
Sarah	Myles	3213
Ioanna	Namintraporn	4593
Val	Napier	4451
Ann	Nash	1284
Julie	Nash	2753
Katie	Nash	3731
Murtadha	Nasralla	1237
	National Grid	1641
	Natural England	4132

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Skina	Nazir	3506
Safina	Nazir	3682
Janet	Neal	2502
Hazel	Nelson	3157
Andrew	Nelson	4655
John	Nett	3804
	New Zealand Golf Club	1153
R S	Newberry	1991
Chris	Newell	863
Graham	Newell	2593
A	Newell	2605
Jason	Newman	1890
Matt	Newman	3130
Linda	Newman	3201
S	Newman	3316
Andrew	Newman	3344
Lamene A M	Newman	3356
Zoe	Newman	3843
Jason	Newman	3854
Stephen	Newman	4545
Bernard	Newnham	4300
Pauline	Newton	1200
Neil	Newton	3721
Jerry	Ngwen	3110
Nellie	Ngwena	2734
Jim	Nichol	4070
C S	Nicholas	2632
Steve	Nicholls	2500
Richard	Nicholls	3665
Sonya	Nicholls	3669
Ian	Nicholson	3629
Debbie	Nicholson	4193
Jo	Nigrelli	4188
Mehran	Nikoo	4359
Jeremy	Niland	4073
Natasha	Nilsson	4023
Ansa	Nisa	4547
David	Niven Reed	140
Peter	Noel	169
Ann	Noel	435
Carol	Norman	3027
Jean	Normington	1229
Susan	North-Coombes	1896
D P	North-Coombes	4004
Christine	Northrop	3754
Raymond	Northwood	3690
Ken	Nurse	2511
Alison	Oag	3384

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Judith	Oakley	1670
Mike	Oborne	1014
Jane	O'Brien	3448
Dominic	O'Carroll	3466
Helen	O'Donovan	790
Francesca	O'Driscoll	3132
Geraldine	O'Farrell-Wallum	3242
Geraldine	O'Farrell-Wallum	4567
Tanya	Ogland	3555
Brenda	Oglesby	2190
Terence	O'Keefe	337
M E	O'Keefe	530
Nigel	Oliver	4713
Diana	Olmos	2619
Antony	Olszak	52
Paul	O'Neill	4031
Rory	O'Neill	4032
Jack	O'Neill	4376
Karen	O'Neill	4505
Hannah	O'Reilly	1705
Garrett	O'Reilly	1706
Siobhan	Osborn	1899
Marietta	Osborn	41
Julia	Osggerby	2182
Nicky	O'Shea	3072
Hilary	Osmon	3918
Tania	Osner	4318
Yvonne	Osprey	3904
Philip	Osprey	3905
Jennifer	O'Sullivan	2738
M A	O'Sullivan	3535
Linda	Oswick	2231
Ilona	Otrebska	4535
Jamie	Oughton	3349
Chris	Owen	3528
Gaynor	Page	4002
Victoria	Page	4725
J R	Pain	60
Richard	Palk	2856
Janie	Palk	3872
Luke	Palmer	2834
Liz	Palmer	2836
S A	Palmer	4129
Angela	Palmer Melham	2799
Delphine	Palmowski	3702
Frank	Palombo	4016
Jit	Panesar	3104
Philippa	Park	3091

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Jason	Park	3123
Alfred Bruce	Parker	34
Nick And Gill	Parker	747
James	Parker	1516
Michael	Parker	4348
Keith	Parker	4467
Wendy A	Parkes	1963
Colin	Parnell	1649
Mr	Parnham	2510
Linda	Parratt	3781
Sally	Parratt	3802
Hannah	Parratt	3803
C	Parris	2837
Gill	Parry	3741
Elizabeth	Parry	4007
Paul	Parsons	1489
Geoffrey H	Parsons	2141
Edwina	Parsons	3638
Paul	Parsons	3885
Roger	Parsons	4289
Latha	Parvataneni	2340
Roger	Pashley	1648
Roger	Pashley	1677
Mary	Pashley	2520
Carol	Pasquill	4758
Dee	Patel	2750
Kali	Patel	3462
Prakash	Patel	4290
Dean	Paterson	2406
Leanne	Paterson	2407
Jon	Patient	2879
Kirsten	Patient	4439
Dayanand	Patil	2441
Karen	Patrick	4742
Tanya	Patterson	4399
Gerald	Payne	1428
Rob	Payne	2487
Matthew	Payne	2880
Kirsty	Payne	2882
Carol	Payne	2883
Ann	Peake	4729
Phil	Peakin	4114
Carolyn	Peakin	4115
Norman A	Pealing	1962
Yvonne	Pearce	2555
Chris	Pearce	2871
Jeffrey	Pearce	2876
Sandra	Pearce	4072

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Jenna	Pearson	163
Joseph	Pearson	799
Maggie	Pearson	1329
Tamara	Pearson	1877
Michael	Pearson	3514
John	Pearson	4266
Margaret	Pearson	4269
Sandra	Peet	3550
David	Peet	3582
Ashley	Pember	3791
Linda	Pember	3805
Jan	Pembroke	3559
Andy	Penton	2841
Jacci	Penton	2844
Stan	Peploe	2741
Janet	Pepper	3937
Anthony	Percy	2878
Donna	Perdue	3121
Graham	Pereira	1032
Lesley	Perkins	1851
JJ	Perkins	3567
Jeremy	Perkins	3704
Margaret	Perks	4755
Rosario	Perri	2063
Jennifer	Perri	2064
Antonio	Perri	2065
Vincenza	Perri	2066
Maria	Perri	2067
Janet	Perrot	4343
Robin	Perrot	4370
Matt	Perry	4378
Nigel	Perryman	4541
Kim	Peters	2055
Tony	Peters	2056
Lucy	Peters	3636
Christian	Petrou	3523
Stephen	Pheasant	2870
Danielle	Phillips	2989
Richard	Phillips	3016
Jean	Phillips	3018
Leslie	Phillips	4201
David	Phillpot	3347
Andre	Philpot	739
Kay	Philpot	743
Simon	Phipps	3182
L P	Phipps	3864
Laura	Piatti-Powell	1690
Tracy	Pickering	4480

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Gemma	Pickett	4662
Anne	Pinfield	4069
Matthew	Pink	2216
Matthew	Pink	3330
Steven	Pink	3664
Lyndsay	Piper	3503
Steve	Pirson	42
Linda	Pitkethly	2164
Nikki	Pitt	4757
Leigh	Pitts	1827
Michael	Pitts	2270
Deborah	Pitts	2280
Clive	Plant	2607
Sarah	Plastow	1305
Julia	Platia	3919
Dawn	Playfoot	4719
Geoff And Jean	Plowman	2421
Geoff And Jean	Plowman	2471
Stephanie	Plowright	3695
Mrs	Plumbridge	4518
Elizabeth	Pocknell	4198
Elizabeth	Pocknell	4425
Davon	Pointer	3080
Davon	Pointer	3101
Clay	Pole	4398
Patricia	Pollard	53
David	Pollard	194
Hannah	Pollard	2707
Sophie	Pollard	2991
Daisy	Pollard	2992
Katie	Pollard	3978
Chris	Pollard	4176
Richard	Poole	2361
Eileen	Pope	3162
Martin and Jill	Pope	4507
Manuel	Portelinha	2881
Maria	Porter	2560
Mark	Porter	2561
Clare	Postma	3013
Johan	Postma	3015
F V	Pound	27
Linda	Povey	801
Thelma	Powell	1402
Cliff	Powell	4146
A J	Pratt	415
Karen	Prenczek	938
W N	Preston	3585
Daphne	Price	2656

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Carrie	Price	4194
N W	Price	4332
Christine	Pring	2384
Carl	Pring	4052
Malcolm	Pritchard	1205
Marjorie	Pritchard	1210
Louise	Pritchard	2181
James	Prout	2478
Barbara	Prowle	4221
Tracy	Pryce	4128
W J	Pugh	1315
Katie	Pugh	3496
Sally	Pugh	3758
Felicity	Pugliese	4082
L	Pullen	302
Christopher	Punch	466
Kay	Pyke	4628
	Pyrford Green Belt Action Group	667
	Pyrford Neighbourhood Forum	496
Natasha	Quader	1683
Bill	Quain	1893
Nicola	Quibell	2823
Geoff	Quin	2302
Maria	Quinnell	4723
Justin	Quintal	1736
Wendy	Quintal	1938
Jennifer	Quirk	3625
Anthony	Quirk	3627
Olive	Rafferty	3697
Esther	Ragnoli	3107
Lynne	Rainbird	2896
Devina	Ramchurn	1888
Jacqueline	Ramm	1257
Malcolm	Rapps	148
A G	Ratcliffe	2557
E D V	Ratcliffe	2559
Naomi	Raval	3595
Animesh	Raval	3656
Frank	Ray	3432
Martin	Read	4444
Jane	Read	4445
Nigel	Readings	4277
Amy	Reddick	4653
Peter	Redman	4138
Lorraine	Redrup	4303
Kathryn	Reed	2827
Brian	Reed	3568
Matt	Reed	3673

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Catriona	Reed	3723
Rachel	Reed	3865
Robin	Rees-Jones	4044
Lyndsay	Rees-Jones	4045
Catherine	Reeve	1053
Dr Nigel	Reeve	2535
Ingvild	Reeve	3383
Steve	Reeve	3387
David	Reeve Fell	4331
Nicola	Regan	3463
Charlotte	Regan	3784
Gillian	Reid	1115
Elisabeth	Reid	1117
Catherine	Rendall	479
A K	Restarick	2294
Vera	Restarick	3662
Claire	Rhoades-Brown	2278
Fiona	Richards	2875
William	Richards	3001
Barry	Richards	4102
Fiona	Richards	4404
Barry	Richards	4672
Noel	Richardson	2519
Seema	Richardson	2661
Colin	Richardson	3732
Nick	Riches	3220
Gemma	Richmond	4169
Janette	Rickard	2492
John	Riddick	2601
Robert	Rider	3884
Simon	Ridge	3671
Christine	Riggs	936
Christopher	Riggs	937
Will	Riley	1691
Ann	Riley	2531
Richard	Riley	2532
Kate	Ripley	3106
Lucy	Rissik	2789
Fiona	Ritchie	232
Alistair	Ritchie	238
Claire	Ritchie	664
Alexander	Ritchie	687
M	Rivett	2412
Jan	Roake	3205
Rae	Robbins	4
P D	Robbins	4039
Valerie	Roberts	100
Vivienne	Roberts	2076

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
S	Roberts	4232
J	Roberts	4234
Dennis	Robins	2363
Alan	Robinson	1846
Paul	Robinson	3167
Clare	Robinson	3526
Kate	Robinson	4226
Angela	Robinson	4759
Elizabeth	Robshaw	4762
Patricia	Rochester	1493
Barbara	Roddy	317
Margaret	Roderick	4632
Wally	Rodgers	3895
W A	Rogers	2486
Colin	Rogers	2645
Laurence	Rogers	4471
Joy	Rogerson	3141
Mr	Roland	4107
Patricia T	Ronnson	2393
Ian	Ross	606
Sarah	Ross	1904
Jan	Rossouw	3287
Thomas	Rothen	4388
Brenda	Rouse	2651
David	Rousham	1586
Momtchil	Roussanov	2291
Julie	Rowe	2296
Alan	Rowe	2297
George	Rowland	4139
Daphne	Rowland	4140
Stuart	Roy	3628
Louise	Rozee	2395
Darren	Ruane	2604
Maurice	Rubin	427
Maurice	Rubin	3811
J	Rubin	4190
J	Rubin	4361
Julie	Rudland	2648
John	Rudland	2649
Kendeep	Ruhomon	908
Jackie	Rulton	1379
	Runnymede Borough Council	661
Natahsa	Ruparalia	2917
Joanna	Russell	2085
Sarah	Russell	3474
Catherine	Russell	4257
Alison	Rutherford	3288
Nigel	Rutland	3210

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Beryl	Rutland	3211
Sylke	Ryan	2646
Maria	Ryan	4389
Matthew	Ryder	1554
Jo	Ryder	1564
Megan	Ryder	2351
Susan	Ryder	4238
Ken	Ryder	4239
Jo	Ryder	4416
Matthew	Ryder	4709
John	Rymill	2808
John	Rymill	2809
Mike	Sacchi	2716
Akeel	Sachak	692
Mehreen	Saeed	2913
Emma	Saffin	3294
Lynda	Sage	2631
J	Sales	3042
James	Salford	3998
Mustafa	Salman	1235
Michael	Salmon	4272
Linda J	Salt	1230
G S	Salt	1539
Robbie	Sampson	1232
Barbara	Sampson	1233
Karen	Sandford	3950
Terence	Sandford	3951
Cathy	Sandsund	3084
Maria	Santos	1343
Maria	Santos	2059
Paul	Saper	154
Rosalind	Saper	175
Satvikananda	Saraswati	1238
Matt	Saunders	934
Anthony	Saunders	2447
Anthony	Saunders	2449
Dave	Saunders	2897
Dave	Saunders	2898
Jenny	Saunders	4006
Liz	Saunders	4274
Jack	Saunders	4520
Liz	Saunders	4746
Glenn	Sawyer	3252
Caroline	Scannella	919
Salvatore	Scannella	920
M	Schafer	4470
Sue	Scheide	4015
Rob	Schifano	3240

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Pauline	Schlotel	2313
Helen	Schlotel	2362
Keith	Schneider	2618
J A	Schofield	3185
Rebecca	Scholes	3392
C	Schulten	3096
Mrs	Schulten	3097
Martin	Scott	910
John	Scott	3994
Carol	Scrivner	3433
Barry	Scrivner	3769
Neil	Search	4465
Hannah	Searle	3112
Chris	Sears	822
Carmel	Seear	2201
Alfred Roger	Seear	4105
Shirley	Selden	144
Barry	Sellick	2232
Peter	Semon-Ward	2234
Veronica	Semon-Ward	3006
Sheila	Sen	3351
Gemma	Sergant	3203
P L	Serwent	425
Linda	Sewell	3749
Aksan	Shaffi	3497
Tanya	Shah	1422
Rhiannon	Shah	1455
Tanya	Shah	4394
Altaf	Shaikh	1843
Meenaxi	Sharma	1954
Richard	Sharp	1460
Richard	Sharp	3850
Andrew	Sharples	2450
Kirsten	Sharples	2490
D	Sharples	3165
Jamie	Sharpley	4528
Robert	Shatwell	3350
Robert	Shatwell	4669
Meirion	Shaw	2040
Jennifer	Shaw	4418
Darren	Shaw	4491
G E	Sheat	4523
Victoria	Sheerman	3296
Antony	Shepherd	4067
Margaret Mary	Shepherd	4068
Stephen	Shepherd	2415
Caroline	Sheppard	2829
Claire	Sheridan	43

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Madeleine	Shillaker	4177
Tom	Shillaker	4178
Sylvia	Shilvock	3324
Kota	Shivaranjan	3521
Peter	Short	3632
Brian	Shreeve	1578
David	Shuttleworth	2473
Jeremy	Sigger	4423
Jane	Sigger	4440
Rebecca	Sim	2633
Sandra	Simkin	700
David	Simmonds	2874
Sally	Simone	3907
Michel	Simonian	1772
Jennifer	Simonian	1773
Jannifer	Simpkins	611
Marion	Simpson	1675
Hannah	Simpson	2489
Claire	Simpson	2665
Ken	Simpson	3261
John	Simpson	4181
Louise	Sinclair	2666
Binita	Singh	2345
Joyce	Singh	2616
Mary	Sinnott	2606
Julia	Sirett	3725
Jyoti	Skelding	2306
Jayne	Skelton	3507
Mark	Skerl	3318
Trevor	Skidmore	3913
M	Skilton	1350
M	Skilton	3196
M	Skilton	4360
Leanne	Skilton	4375
Winifred	Skipler	12
Colette	Sleat	3010
R	Slevin	3311
Briony	Sloan	4551
David	Sma	3206
Alan John	Small	2027
Jillian	Smart	1491
Phil	Smart	1492
Rudi	Smeaton	2111
Natalie	Smeaton	2113
Mark	Smedley	1183
Jeff	Smeeton	4197
Loes	Smeets-Barber	1361
Deborah	Smith	36

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Frank And Barbara	Smith	161
Jean	Smith	352
Anne	Smith	874
Dave	Smith	930
Christopher And Claire	Smith	1011
Gavin	Smith	1065
Jane	Smith	2360
Jo	Smith	2503
Janan	Smith	2504
Janice	Smith	2982
Stuart	Smith	3009
A	Smith	3328
A	Smith	3608
Alan	Smith	3651
Hannah	Smith	3691
Andy	Smith	3778
Marion	Smith	3959
Anjali	Smith	3991
Robert	Smith	4141
Anna And Andrew	Smith	4311
Alexandra	Smith	4392
Helen Frances	Smith	4393
Carrie	Smith	4515
Michael	Smith	4529
Dudley	Smith	4557
M A	Smith	4629
Roger	Smith	4637
Lesley	Smith	4680
Abigail	Smith	4751
Amelia	Snare	3450
Stephanie	Snashall	2220
Charlotte	Sneddon	1376
Charlotta	Snelgrove	1098
James	Snelgrove	1943
Muireann	Snow	478
Gill	Snow	2655
Mark	Snow	3944
Rosemary	Solari	2475
Giuseppe	Sole	4005
Alan	Somers	1998
Gabriel	Sore	3238
Damian	Sorgiovanni	2542
Emma	Soutar	2714
Michael	Soutar	2792
Peter	Soutar	2869
Elizabeth	Southern	1384
Colin	Southey	1222
Lynn	Spankie	3542

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Martin	Spankie	3543
Lesley S	Speller	85
Leonard F	Speller	89
Heather	Spencer	2180
Claire	Spencer	3394
Matthew	Spencer	3419
David	Spencer	3551
Adrian	Spencer	3657
Judith	Spencer	3658
Claudia	Spencer	3659
Roland	Sperryn-Jones	1
David	Spiller	2814
	Sport England	413
Peter	Spreckley	3646
Gajan	Sritharan	2647
Suki	Sritharan	3952
Christopher	Stableford	955
Christopher	Stableford	998
Susan	Stacey	608
Charlotte	Stacey	2037
Denise	Stacey	3156
Sally	Staden	4228
Fiona	Stafford	4474
Jan	Stammer	3912
Kelly	Stanford	2659
Christopher	Stanley	2583
Pat	Stanley	2584
Peter	Stanley	3451
Tracey	Stanley	3787
Carolyn	Stanley	4427
Garry	Stansby	3569
Carl And Linda	Stead	2160
David	Stedman	1485
John	Stedman	2048
Rod	Steel	2779
Annette	Steele	2726
Keith	Steer	935
Margaret	Steer	1885
W D	Steer	1886
Ian	Steer	2285
Jakki	Steer	4442
Teresa	Stembridge	2703
Warren	Stembridge	2704
Barbara	Stentiford	751
Alexander	Stephens	4142
Alan	Stephenson	4495
Mark	Stevens	1095
Mark	Stevens	2556

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Megan	Stevens	3364
S	Stevenson	3044
G	Stevenson	3045
Paul	Steventon	4429
Rachael	Stewart	2828
Graeme	Stewart	2842
Alex	Stewart	3470
C	Stewart	3577
Danielle	Stewart	3580
Sophie	Stievet	2210
Daniel	Stilwell	3415
Della	Stokes	4254
Brian Michael	Stokes	4486
Harry	Stollard	1039
Tim	Stolworthy	4583
Ann	Stone	645
Eden	Stone	2359
Brenda	Stone	4511
Martin	Stone	4512
Andrew	Stonhold	2839
Alex	Stopps	2722
Jennifer	Stott	4013
Caroline	Street	1534
Robert	Streeter	3332
Angela	Strev	3207
A	Strev	3208
John And Nina	Strong	48
Neil	Strong	1525
Brian And Carmela	Strong	2134
Alan	Stuart	1172
Marie	Stuart	1215
Jackie	Stuart	3493
Brigid	Stubbs	4552
Kate	Stump	4161
Nicholas	Stunt	2746
Daniel	Sturgeon	3326
Daniel	Sturgeon	4454
Wayne	Suddaby	4174
Vicki	Sullivan	718
Steve	Sullivan	4133
Victoria	Sullivan	4195
Betty	Summers	2849
Laurette	Summerscales	3163
Gemma	Summerscales–Heard	4048
R N and F	Sumner	573
Robin	Sundaram	2347
Helen	Sundaram	2348
	Surrey County Council – Spatial Planning Team	108

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
(Tony Howe)	Surrey County Council – Archaeology	3257
	Surrey Heath Borough Council	2078
	Surrey Wildlife Trust	1220
Katherine	Sutcliffe	1679
Nigel	Sutcliffe	2401
Louise	Sutherland	4112
Yusuf	Sutlan	1880
Stephen	Sutton	3046
Tania	Swarbrigg	631
Graham	Sweeney	3729
Ann	Sweeney	3730
Sarah	Swift	4046
Craig	Swift	4047
Matthew	Swinney	2527
Stephen	Symington	1366
Mark	Symons	3305
Mrs	Tahiraj	1346
Alison	Tait	4294
Gill	Talbot	4649
Nigel	Talbot	4650
Greg	Tallent	3228
Rita	Tallent	3358
R	Taoka-Thompson	3575
Carolyn	Tapp	3960
Sue	Tasker	785
Sophia	Tavakoli	1526
James	Tavakoli	1527
Patricia	Taylor	446
Sam	Taylor	1891
Allen	Taylor	2101
Alan N	Taylor	2214
Lee	Taylor	2462
Natasha	Taylor	2588
Lucy	Taylor	2797
Brian	Taylor	2811
Audrey	Taylor	3527
Reg	Taylor	3874
Joe	Taylor	3956
Helen	Taylor	4248
	Taylor Wimpey UK Ltd	945
Dave	Teague	2477
Catherine	Teague	2752
Stuart	Telfer	4592
	Thames Water Planning and Property	4373
Linda	Thatcher	3178
	The Woodland Trust	1984
M F	Thirlwall	3779
Valerie	Thomas	1231

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Paul	Thomas	2998
Hilary	Thomas	3399
Malcolm	Thomas	3400
Debbie	Thomas	3867
Ben	Thomas	4101
G R	Thomas	4189
Brian	Thomas	4428
Lucy	Thomas	4625
	Thomas Roberts Westminster Limited	3888
Genevieve	Thompson	397
Helena	Thompson	590
Margaret	Thompson	939
Richard	Thompson	1332
Michael	Thompson	2392
Anne	Thompson	2586
H A	Thompson	2612
David	Thompson	3151
Roger	Thompson	4414
Jane	Thompson	4415
Tony	Thompson	4676
Nicole	Thomson	4564
David	Thorne	3830
David	Thorne	4708
Hilary	Thornhill	4395
Paul	Thornton	3914
Carolyn	Thornton	3924
Jennie	Thorpe	2860
Charlotte	Thorpe–Stanley	4295
Martin	Thurston	3866
Steve	Thwaites	1084
Gemma	Tickner	2730
Terry	Tigwell	2217
Craig	Tilbury	4011
Julia	Tilbury	4012
Elaine	Tilley	985
Robert	Tilley	3642
Isabelle	Todd	2609
Neil	Tolefree	4390
Paul	Tombs	4061
Victoria	Tombs	4083
Eileen	Tomkins	2845
Alf	Tomkins	2846
Wendy	Tompsett	1354
David	Tonks	3596
George	Topping	4716
Sibilla	Torricelli	4639
J	Tortolani	4314
Haley	Tortorici	4585

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Rachel	Torzillo	3616
Brian	Townsend	2191
Mark	Trinder	4761
Lisa	Trotter	3475
George	Trow	2150
Lucy	Trustam	3411
Jan	Tuck Martin	2614
Sarah	Tucker	3272
Maria Rosie	Tuckwell	980
Paul	Tuckwell	4096
Philip	Tudhope	1074
Philip	Tudhope	1123
Sarah	Turnbull	3498
Claire	Turner	1816
Amanda	Turner	1872
Gloria	Turner	1874
Jennifer	Turner	2732
Claire	Turner	4297
Chris	Twilley	2706
Stephen	Twilley	4619
Rona	Tyler	4500
Charles	Tyler	4514
Victoria	Udall	2801
	UK Power Networks	3259
Ian	Underhill	4292
Lesley	Underhill	4293
Anthony	Urwin	226
Victoria	Urwin	229
T	Urwin	3286
J R	Vachs	4060
(Christopher Wilmshurst)	Vail Williams	145
Jack	Valentine	2747
Sunette	Vanaarde	2617
Eric	Vardy	4754
Angela	Vardy	4756
Colonel RES Stuart	Vasey	3158
Jenny	Velati	3848
Matthew	Verran	4749
Erika	Vincent	1665
Kim	Vincent	2915
Dr Manvinder	Virdee	3226
Mario	Vistocco	2068
Pamela	Vivian	2899
Becky	Voice	1834
Cornelius	Vosloo	3859
Martin	Wadds	3300
Emma	Wade	3077
Annie	Wade	3816

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Joy Elizabeth	Waine	3529
Michael	Waine	3531
Jill	Wakefield	663
Annabella	Wakefield	1958
Jill	Wakefield	4215
Margaret B	Walker	1223
Julian	Walker	1299
Adrian	Walker	3607
A R J And M	Wall	1188
Vera	Wall	3017
Emma	Wallis	1955
Jim	Wallis	3761
Jean	Wallman	2694
Vikki	Walls	4538
Jonathan	Walrond	2850
Sue	Walsh	4504
C	Walton	3281
Jane	Walton	3852
Michael	Walton	4110
Xu	Wang	2207
Jason	Waplinton	3381
Esther	Waplinton	4192
Josh	Warby	123
Philip	Ward	2301
Ian	Ward	2465
Thomas	Ward	3025
Susan	Ward	3684
Molly	Warden	3424
Katrina	Warne	3337
Jennifer	Warren	1003
N	Warren	3056
Ben	Warren	4079
J S	Warrington	3246
Geoff	Warrington	4036
Peter	Warwick	3227
Ella	Warwick	3245
Ben	Warwick	3303
Alan	Warwick	3362
Kathryn	Warwick	3389
Rebecca	Warwick	3499
Justyna	Wasilewska	2051
Eunice	Watkins	1253
Vivian	Watkins	1254
Dave	Watkinson	3576
Chris	Watmore	2709
Colin	Watson	2115
Paul	Watson	3011
Emma	Watson	4717

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Anthony	Watt	622
Sebastian	Watt	929
David	Watt	3552
Clíodhna	Watt	3553
Niamh	Watt	3554
Patrick	Watt	3970
Benedict	Watt	4027
John	Watt	4030
Mary	Watt	4035
Ronald	Watt	4533
Benedict	Watt	4555
Catherine	Watt	4556
Martin	Watts	2041
Sally	Watts	2042
Derek	Watts	3033
Michael	Watts	3513
Elaine	Watts	3515
John	Watts	3519
Derek	Watts	4365
Derek	Watts	4366
Michael	Waugh	2877
	Waverley Borough Council	1129
Marilyn	Wax	1327
Marilyn	Wax	1371
Laura	Webb	3003
Thomas	Webb	3093
Andrew	Webb	4496
Clare	Webber	2697
Mr	Webster	3135
Denise	Weekes	1895
Lyn	Wellbelove	3360
Tony	Wellbelove	3365
Christine	Wells	3180
Avril	Wells	3605
Robert	Wells	3606
Sally	Wells	3922
Chris	Wells	3923
Mrs	West	39
Toby	West	3705
Vivien	West	4682
	West Estates Ltd	117
D	Westbrook	4722
Simon	Westmoor	1674
Karen	Weston	2343
T	Whatley	4659
Jackie	Wheeler	2954
M	Wheeler	3200
Joanne	Whelan	2608

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Rosie	Whetstone	925
Angus And Davida	Whimster	223
Anna	Whindle	2039
Alex	Whindle	2851
Dr Jan	Whitby	3649
Andrew	White	1368
Kathy	White	2004
Richard Charles	White	2289
Ian A	White	2480
Gaynor	White	3331
Kevin	White	3464
Jessica	White	3467
Michael	White	3631
David and Margaret	White	3740
Laura	Whitfield	4627
Sarah	Whitlock	4750
William	Whittaker	4638
Richard	Whittington	2344
James	Whittington	3591
Helen	Whittington	3862
Steven	Whittington	4489
Ian	Whittle	451
Hilary	Whittle	1394
Jackie	Wickens	2188
Susan	Widdup	4309
Michael	Widdup	4310
Michael	Widdup	4647
Ubhayapriya	Wijetunge	3763
Liz	Wilcockson	2581
Elizabeth	Wild	2095
Gillian	Wilder	2765
Rachael	Wilds	2137
Geraldine	Wilkie	2491
Robin	Wilkin	805
Hanna	Wilkin	1024
Nicola	Wilkins	662
Mark	Wilkinson	626
Melanie	Wilkinson	4283
Janet	Willetts	3800
Tina	Williams	979
Oliver	Williams	1228
Antony	Williams	1334
Zoe	Williams	1605
Nigel And Mary	Williams	1901
Elsbeth	Williams	2404
Nicola	Williams	2553
D	Williams	2639
Georgia	Williams	2642

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Richard	Williams	2902
Craig	Williams	3225
Dorelle	Williams	3341
June	Williams	3906
M A	Williams	4499
D P	Williams	4652
John	Williamson	2526
Kenneth	Willingham	2062
Martin	Willis	4591
Rick	Wills	1009
Nick	Wills	3307
Cecilia	Wills	3969
Graham	Wilmot	3184
Patricia	Wilson	1389
Richard	Wilson	1920
B E	Wilson	2154
Emma	Wilson	2592
Christopher	Wilson	2653
Douglas	Wilson	2705
B	Wilson	3290
Alan	Wilson	3685
Robert	Wilson	4066
Julia	Wilson	4406
Julia	Wilson	4443
Diane	Wiltshire	401
Alan	Wiltshire	406
Johanna	Wiltshire	3993
Jasmine	Wiltshire	4001
Margaret	Windsor	1894
Matthew	Windsor	3668
M E E	Winfield	75
B R	Winfield	80
Anne	Winfield	3023
B A	Wingate	2419
Paul	Winterford	2819
Vincent	Withers	559
Pamela	Witze	3099
S R	Woakes	3879
	Woking Constituency Labour Party	3275
Remy	Wong	3050
Tom	Wood	3040
Jamie	Wood	3814
Graham	Wood	3926
Kathryn	Wood	4003
Frances	Wood	4338
Frances	Wood	4553
Graham	Woodham	1497
	Woodham And Horsell Neighbourhood Forum	1544

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
	Woodham And Horsell Neighbourhood Forum	4702
Alison	Woodroffe	580
Kieron	Woods	1774
Claire	Woods	1848
John	Woolgar	1102
John	Woolgar	3170
Ronald	Woollcott	2620
Ronald	Woollcott	4559
Norman	Woolley	1277
	Worplesdon Parish Council	3438
Tina	Worsfold	3074
Peter	Wren	2513
J L	Wright	441
Mary	Wright	2854
Alison	Wright	3302
Carolyn	Wright	3488
Suzanne	Wright	3592
Tim	Write	3212
Richard	Wyld	2781
Sandra	Wylie	612
Jamie	Wynne-Morgan	4183
F	Yakas	3030
Catherine	Yeo	1821
Andrew	Yeo	2017
Charlie	Yianoullou	2729
John	Young	2736
Jack	Young	4092
Philip	Young	4582
Shelley	Zambardi	2857
Tony	Zambardi	2858
Sharon	Zammit	4487
Roger	Zammit	4488
Larissa	Zaporajtchenko	4596
Jane	Zeal	2186
Sarah	Zone	1577
Adam		4720
Alejandro		3456
Alex		3128
Anna		1125
Anna		2052
Anthony		3095
Balfour		3479
Beth		2472
Betty		3047
Bianca		2825
Cat		2538
Catherine		2454
Chloe		2044

<b>Name</b>	<b>Surname / Organisation</b>	<b>Page Number</b>
Dave		3137
Diana		2660
Doug		4186
Elizabeth		2543
Emma		4584
Erin		3672
Fiona		3447
Gilbert		2514
Gill		3166
Iovana		2831
Ivan		3126
Jabie		3801
John		32
John		3014
Kathy		3127
Kerry		3090
Kevin		3160
Les		3021
Levi		3877
Linbeth		3327
Lucy		2203
Maria		4103
Mark		3683
Mehran		3138
Michelle		3473
Mohindra		3873
Nicky		3532
Nicole		3661
Nixon		3098
Paula		2790
Philip		3391
Puja		2806
Ray		3131
Rebecca		4281
Riki		3512
Ronnie		2283
Sarah		2643
Shaun		1122
Simon		1840
Sophie		3113
Stacey		3798
Sus		2305
Tracey		3198
Will		3024

If you have any difficulties locating a representation, the officer response or any of the associated Topic Papers then please contact the Planning Policy Team at [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk) or on 01483 743871.

## Officer summary and response

**Contributor Reference:** 01871/1/001  
**Customer Name:** Mr Roland Sperryn-Jones

**Summary of representation:**

Objects to the proposal.

1. The proposal has been sprung on Woodham with no prior warning and at the last moment prior to a Council meeting. Questions whether it is a lawful process. This is one of the few areas without a neighbourhood forum. There are sites which should be development first e.g. in Pyrford and West Byfleet. The new site is simply inappropriate.

2. Recognises the need to build houses, but they have to be in the most appropriate locations. Woodham is Green Belt, has ancient woodland and is adjacent to Horsell Common. There are other more appropriate areas.

3. The proposed development site is immediately adjacent to the waste disposal in Martyrs Lane – not the best place to build new homes.

4. There are serious infrastructure problems which are unlikely to be addressed by developers. Developers will squeeze in far more housing units than they have permission for, which will cause an unacceptable level of urbanisation with 'developed creep' along Woodham Lane to Addlestone.

5. The A320 and A245 are the two major A roads bisecting the Borough. They are already unacceptably congested and a few thousand more cars exiting on to them will make the situation worse. The proposed development would need to exit on to both of these roads at some point.

6. Going North on the A320 is the main route for the majority of Woking residents to reach St Peters Hospital and the M25. The A245 runs from Chobham, through the Six Cross Roads, West Byfleet, Byfleet, Brooklands to the A3 at Cobham; both these routes are already congested without adding to the problems.

7. The mini-roundabout on the A245 near the entry to the New Zealand is already identified by SCC as one of the most congested in the County before including additional traffic from the development proposal.

7. The destruction of New Zealand Golf Course would be barbaric and vandalism. It has national repute as one of the oldest clubs in the area. The loss of a club such as Traditions in Pyrford would have limited impact.

8. There is a lack of infrastructure in relation to schools, GP surgeries and public transport (buses).

9. There will likely be impacts on train capacity from West Byfleet and Woking stations into London, with more people standing on trains and using inadequate parking facilities.

**Officer Response:**

Objections are noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses some of the issues raised in the representation in detail, including the importance of the Green Belt at this location and the possibility that development will lead to urban sprawl, the traffic impacts (including on the A320 and A245); public transport infrastructure, provision of other necessary social, physical and green infrastructure, impacts on ancient woodland, implications of the recycling centre being located on the site, justification for consulting on Martyrs Lane site as a reasonable alternative site to meet future development needs and how the decision of the LDF Working Group and full Council was reached.

The decision to consult on the option of land to the east of Martyrs Lane as a reasonable alternative is a legitimate one and there is evidence to justify its consideration. Paragraph 182 of the NPPF deals with the examination of Local Plans. It stresses that to be found sound, a Local Plan amongst other things must be justified. The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It would have been irresponsible of the Council if it did not at least consider this as a reasonable alternative in the light of the changing circumstances regarding the part of the land in the ownership of McLaren which occurred after the Regulation 18 consultation. The Local Development Framework Working Group gave clear reasons why the land should be identified for consultation. This is documented and is on the Council's website.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

The New Zealand Golf Course was included in the proposal as any development of the northern parts of the site alone would result in an unconnected area of development away from the main urban area of the Borough. The Council acknowledges that any future development on land to the east of Martyrs Lane may result in the loss of recreational open space (i.e. the golf course). It should be noted that planning policy in the Core Strategy permits the loss of open space where it can be demonstrated that an alternative and equivalent or better provision is

made available in the vicinity, or the development is directly related to the enhancement of the open space. Any planning application coming forward for development at the site would need to take this into account. As part of this consultation, Sport England has been consulted on the proposal and their representation and the Council's response can be accessed for further information.

It should also be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

There have not been any surveys carried out specifically addressing the likely impact on train capacity at Woking or West Byfleet stations, or impacts on parking facilities. The Council is updating its Infrastructure Delivery Plan to support the preparation of the Site Allocations DPD, and Officers are working with infrastructure providers, including train operators, to determine the likely impact of site allocations on future capacity. This work is ongoing.

**Contributor Reference:** 02665/1/001

**Customer Name:** Rae Robbins

**Summary of representation:**

Contacted as a member of the Citizens' Panel to give views. Strongly objects to the proposal due to impacts on environment in terms of ecology and community.

It seems odd that professional conclusions accepted last year should now be questioned. Councillors must decide on the most suitable, sustainable and deliverable sites based on objective criteria.

A map is enclosed showing proposed developments on this site, Fair Oaks, Brox Lane, the Veterinary Establishment land, the land to the north of the A317 and the Longcross site. All of these proposals together lead to urban sprawl and contribute towards towns merging. The definition of sprawl is 'to spread stragglingly'. The Martyrs Lane development would be cut off from Woking by the A320 and A245; it breaks the very obvious Green Belt boundary – a sensible and defensible boundary. The originally proposed sites are additions to existing settlements rather than new, separate housing areas. The proposals in Mayford seem to add to the rather linear but successful community in a logical fashion.

It is incomprehensible that the Council and Surrey Heath Council seem intent on ruining the Horsell Common SPA habitats and evicting its Nightjars and Dartford Warbler. The proposed SANGS will not stop a large number of additional walkers and their dogs from using the Common and disturbing these birds' nests. Policy NRM6 makes it clear that priority should be to direct development to areas where adverse impacts on the SPA can be avoided; and then to mitigate any impacts. Policy CS7 lauds green corridors as paths for migrating species – the River Bourne is an example, and would be compromised by development on this land.

A new settlement here should not have its own doctors' surgery; the whole future of the NHS is for bigger practices with wider competencies. Existing facilities are not easily reached from the site. A new school may be needed but within a generation the demand will drop and the school will not be easily accessed for use from other outlying areas except by car. The original proposals have better access via foot or bike to neighbourhood centres; the Mayford ones less so but perhaps the retail provision here would be expanded to some extent.

There would be traffic problems. The 2015 Surrey Infrastructure Study identified two congestion black spots: one was Six Crossroads roundabout and the other the A320 to the north. Another 2/3000 houses here will add to congestion causing more delays, including on the A245. Whilst in the originally proposed sites, a more modest level of additional housing will add to these black spots.

The Golf Course has stated its land is not available for development, whereas the owners of originally proposed sites are willing to accept development.

Any application to develop the land east of Martyrs Lane will require substantial, expensive research into wildlife, flooding, contaminated land and subsoil stability before any building could be permitted. The cost and risk burden for any developer must therefore be much greater than with the other sites.

Understands the need for more housing, but the site is not suitable, sustainable or deliverable. Even the Hankinson Duckett report concludes it is of critical importance to the Green Belt. It is therefore hard to see how this site should be given priority over the other sites.

#### **Officer Response:**

Objection is noted and the points raised in the representation will weigh in the balance of considerations by Members.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses many of the concerns raised in detail, including:

- conclusions from the Green Belt boundary review and Hankinson Duckett Landscape assessment into contribution of the land towards Green Belt purposes such as urban sprawl and towns merging (Officers accept that the conclusions of the studies are sufficiently clear to demonstrate development would lead to urban sprawl and an incursion into the Green Belt, and this is before nearby proposals such as Fairoaks are taken into account);
- the reasons why earlier recommendations by Officers are being questioned by the Council due to a change in circumstances with the land in ownership of McLaren;
- impacts on wildlife and how it is recognised that policy CS7 of the Core Strategy protects and enhances biodiversity assets and features such as green corridors;
- how development of the site would not compromise the Thames Basin Heaths SPA and how it would comply with policy NRM6;
- the sustainability of developing the site, including availability of public transport infrastructure and provision of other infrastructure services such as schools and health facilities;
- the traffic implications of the proposal (of 1,200 houses) and the original proposals on the A320 and A245, taking into account conclusions from Transport Assessments and other evidence including the Surrey Infrastructure Study;
- the availability of the land for development, and deliverability;
- the need for an extensive ecological survey, and other assessments, to be made requirements of any development proposal on the site that would come forward for determination.

Section 10 of the Duty to Cooperate Consultation Bodies Topic Paper also provides further detail on the potential for urban sprawl and merging of towns.

Should the Martyrs Lane site be safeguarded for future development, the Consultation Paper sets out how a new strong, defensible Green Belt boundary could be drawn. This is not therefore considered to be an obstacle to potential development at the site. Some points raised in the representation, however, are noted, including the separation of the site from the

main urban area by the A320 and A245 in contrast to the originally proposed sites which are considered to be additions to existing settlements. However, this in itself presents merits such as the opportunity to create a new community with its own infrastructure and local economy. Officers do not necessarily agree that a new settlement at the site should not have its own facilities. Officers would take advice from the relevant infrastructure providers such as Surrey County Council regarding the capacity of surrounding infrastructure, and the need for new infrastructure. SCC has indeed responded to this consultation advising that a new primary school would be likely (see Section 13 of the Duty to Cooperate Consultations Bodies Topic Paper). Population demographics of new communities are complex, but it is likely that families will come and go in a similar vein to other areas of the Borough, thus maintaining a steady demand for local facilities. It is, however, true to say that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has received a representation from Natural England and Horsell Common Preservation Society regarding the Thames Basin Heaths SPA and has responded accordingly. The responses are available to view for further information. In summary, the Council does not accept that the development of the site would compromise the overall integrity of the nearby Thames Basin Heaths SPA and its ecological integrity and the ecology of the wider area. The site can be developed to comply with the requirements of Policies NRM6 of the South East Plan and CS8: Thames Basin Heaths Special Protection Areas of the Core Strategy. Natural England does not have any objection in principle to the proposal, subject to the appropriate measures of mitigation being agreed. This matter has been addressed in detail in the Officer's response to the other representations made by Horsell Common Preservation Society. There is no proven functional linkage between the SPA and the site, which is of such significance to prevent the development of the site.

**Contributor Reference:** 02636/1/001

**Customer Name:** Mrs J McKay

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site

Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 01736/1/001  
**Customer Name:** Mr Winifred Skipler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02959/1/001

**Customer Name:** Mr Nigel Guy

**Summary of representation:**

Martyrs Lane site is a far preferable site because:

1. gives the development critical mass and can comfortably accommodate 1200 houses, including affordable housing, together with the attendant infrastructure. Many development and planning advantages in creating a single, new, larger housing development, rather than dispersed smaller ones. This also makes it more economically viable to develop the attendant community infrastructure.
2. Proximity to major road north of Woking with good access to M25 and Woking Town Centre, and good public transport and cycle routes exist here. Scope to widen A320.
3. Proximity of major employers nearby, which would benefit from adjacent housing.
4. Land north of golf course was intended to have been developed by McLaren, and is largely redundant. Gives a presumption for development. It also has no national or local landscape designation.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications.

The Council has the resources and expertise to determine planning applications for single or multiple sites, and development of a single site would not necessarily simplify the process for obtaining planning permission.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. The Regulation 18 Issues and Matters Topic Paper sets out a detailed response (under paragraph 3) to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. Parcels of land north of the golf course were assessed as part of the Site Allocations DPD process, and ruled out as their development would lead to isolated development in the Green Belt (see paragraph 3.5.11 of Peter Brett's Green Belt Boundary Review report). It is accepted that the Martyrs Lane site does not contain landscape constraints such as those designated under policy CS24 of the Core Strategy (i.e. 'escarpment and rising ground of landscape importance'), but it does contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

**Contributor Reference:** 02611/1/001  
**Customer Name:** Ms Hilary Dennett

**Summary of representation:**

- 1) Removal of Green Belt
- 2) Urban Sprawl
- 4) Road congestion – bad enough already.
- 5) Lack of public transport to support this new town.
- 8) Wildlife (protected)
- 10) Woodland removal

I cannot think of a worse location for an additional 3,500 homes.

It is totally unsustainable.

**Officer Response:**

The Council's response to the issues raised can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

It should be noted that the proposed number of dwellings on the Martyrs Lane site is 1200, this was clearly stated in the consultation document. Therefore the representation is incorrect to state 3500 dwellings.

**Contributor Reference:** 03018/1/001  
**Customer Name:** Mr Geoff Geaves

### **Summary of representation:**

Whilst it is regrettable that Green Belt land has to be used, support for land east of Martyrs Lane to be substituted for the 6 original sites.

The land, east of Martyrs Lane, is in poor condition overall, whereas the sites in Pyrford are in virgin Green Belt, is currently productively farmed and has been for centuries. It is understood that similar comments can be made for the land in Byfleet and Mayford.

Whilst the southern half of the Martyrs Lane site is occupied and attractively maintained by New Zealand Golf Course the adjacent land, to the north, is unused land owned by SCC, contains derelict army huts and the Sports Club no longer functions. Both the SCC site and the Army Camp site were offered up in the latest SHLAA process but ignored.

The northernmost plot is owned by McLaren and until recently had planning permission for a 60,000 sq. m factory. This plot therefore establishes a recent precedent for development.

The Northern half of the Martyrs Lane Site has the Required Capacity for 1024 Dwellings to be developed and substitute the requirement by the original 6 sites.

### **Building on NZGC is Not Necessary**

Permanent and Defensible boundary to be drawn around a site in Martyrs Lane without taking New Zealand Golf Course out of Green Belt.

Consultants employed by Pyrford Neighbourhood Forum hold the view that the arguments put up by WBC consultants do not support the conclusion that the Martyrs Lane site is of 'critical importance' to the Green Belt.

**Green Belt Constraint** The WBC Green Belt Review by PBA concluded that that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt whereas the Martyrs Lane site was rated as low suitability. Based on this category of evaluation Martyrs Lane should have been selected ahead of the land in Pyrford.

**Sustainability Constraint – Martyrs Lane over Pyrford Land.** Sustainability has been reviewed by PBA, HDA and the Council itself in processing the McLaren planning application. Martyrs Lane was ranked 2nd in sustainability whereas Pyrford land, is ranked only 18th. Thus on the sustainability criteria Martyrs Lane should have been selected ahead of Pyrford Land.

The Brett report concluded that Pyrford land should be classified in the Major Environmental Constraint category. The land is grade 3 agricultural land with some grade 2. The parcel is identified as adjacent to the 'Escarpment and Rising Ground of Landscape Importance' and

actually straddles the local highpoint of the escarpment close to Pyrford Court. The 'Escarpment and Rising Land of Landscape Importance' designation is protected in Woking Core Strategy CS24. By contrast Martyrs Lane falls into category Minor Constraint and should therefore be preferred for safeguarded development land ahead of the Pyrford fields.

There is a degree of agreement between the various reports into landscape character and sensitivity to change. PBA categorised Pyrford land as falling between little or no capacity for change and low capacity for change whereas Martyrs Lane was broadly classified as entirely within the low capacity for change category.

In addition Pyrford land enjoys a rural feel from the network of public rights of way adjacent to the enclosed farmland include as the Pyrford sites. In contrast the Martyrs Lane site is largely inaccessible to the public and has no landscape designations.

Amenity and Heritage Green Belt land in Pyrford is very accessible by a network of public rights of way. The area is actively used by walkers, runners, cyclists and others from all across the Borough. By contrast Martyrs Lane is not easily accessible and in comparison rarely used by the public despite it's Green Belt status.

The Pyrford Green Belt is an irreplaceable asset and has several conservation areas. The Surrey Landscape Character Assessment describes some of the heritage features of land adjacent to the Pyrford fields. The two Pyrford fields are integral to the heritage setting of the area. Martyrs Lane has limited public footpaths through the area and has no known heritage value. It

Economic and Social Benefit Economies of Scale – One larger site of 1024 properties would provide economies of scale, making it easier to resolve infrastructure issues like water, waste, and electricity when compared with the provision of equal services on 6 separate sites spread across the whole borough.

Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by 6 separate sites.

Affordable homes – land values in Martyrs Lane are less than the 6 original sites proposed and this will enable the provision of more Affordable Housing.

Employment – There are three large employers close by the Martyrs Lane site – McLaren, Animal & Plant Health Agency and St Peter's Hospital. Each needs affordable housing for its employees who work shifts. Housing in Pyrford is expensive.

Summary information compiled from the Surrey County Council (SCC) traffic reports suggest Martyrs Lane would alleviate the congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking.

The Martyrs Lane site has the benefit of main A road links – Chertsey Road to Woking and in the other direction Chertsey and the M25. In addition, Woodham Lane provides access to Addlestone, Sheerwater and West Byfleet.

Pyrford & West Byfleet are accessed by B or C roads. Traffic flow along the A245 through West Byfleet & over M25 bridge is close to capacity and widening these roads would be both difficult and ruin the character of Pyrford and West Byfleet.

The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to and from the A320. In contrast access to the 6 original sites is via minor roads and so Martyrs Lane should be preferred for its better traffic access.

The West Byfleet Health Centre is fully subscribed and more facilities will be required for the influx of people in over 1000 homes planned for Sheer House, Broad Oaks and West Hall before 2027. With the potential number of new and additional dwellings at Martyrs Lane, there would be an opportunity to build a new health centre and relieve current healthcare resources at West Byfleet facility.

Schooling – Pyrford CofE Primary School is already full and has taken many pupils from the Maybury area, Martyrs Lane site would be an ideal opportunity to build a new school as part of the development plan.

Martyr's Lane already has better bus services than other sites. McLaren also operate an employee bus service that could contribute to the development of enhanced services to accommodate 1024 dwellings at Martyrs Lane. Arranging adequate services at one site will be easier than to 6 sites dispersed widely across the Borough.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also

looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for

safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Green Belt boundary review report provides sufficient evidence that the release of the proposed allocated sites from the Green Belt will enable defensible boundary to be drawn that will endure over a long period of time beyond the Core Strategy period. At this stage it would be unreasonable to rule out the New Zealand Golf Course and draw a new boundary as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

The Pyrford Neighbourhood Forum consultant opinion is a matter of Planning judgement. The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close

to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of

development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Infrastructure Delivery Plan notes that at present there is adequate GP provision to meet overall demand in the Borough. Whilst this is the case, it is also accepted that there might be locally specific pressures of over subscription that needs to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is seeking to work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

In terms of school provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provider for the area and its views on education will be seriously considered if the site is to be allocated. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of this site or any of the six sites if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

**Contributor Reference:** 02612/1/001

**Customer Name:** M E Hart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02613/1/001  
**Customer Name:** Ms Audrey Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02619/1/001

**Customer Name:** F V Pound

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02615/1/001  
**Customer Name:** Ms Sabine Clark

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

In addition, air pollution is a concern.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper, including on air pollution concerns.

**Contributor Reference:** 02617/1/001  
**Customer Name:** Mr Lawrence Haworth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02618/1/001  
**Customer Name:** Mrs J M Haworth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02614/1/001

**Customer Name:** R W Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02516/1/001

**Customer Name:** John

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02518/1/001  
**Customer Name:** Mr Paul Merritt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02519/1/001  
**Customer Name:** Mr Alfred Bruce Parker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02524/1/001  
**Customer Name:** Ms Holly Merritt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02530/1/001  
**Customer Name:** Ms Deborah Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02562/1/001  
**Customer Name:** Ms Lynne Mullin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02574/1/001

**Customer Name:** Chui Man

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02580/1/001

**Customer Name:** Mrs West

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02624/1/001  
**Customer Name:** Mr Peter Coulthard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02938/1/001  
**Customer Name:** Ms Marietta Osbourn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02939/1/001  
**Customer Name:** Mr Steve Pirson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02940/1/001  
**Customer Name:** Ms Claire Sheridan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02941 /1 /001  
**Customer Name:** Ms Lynette Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02942/1/001  
**Customer Name:** Mr Nigel Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02943/1/001

**Customer Name:** Mrs P V Irving

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02944/1/001  
**Customer Name:** Mr David Baker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02945/1/001

**Customer Name:** Mr And Mrs John And Nina Strong

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02946/1/001  
**Customer Name:** Ms Diane Lowe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02947/1/001

**Customer Name:** Mr Reg Lowe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02948/1/001  
**Customer Name:** Ms Rebecca Denny

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02949/1/001  
**Customer Name:** Mr Antony Olszak

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02992/1/001  
**Customer Name:** Mrs Patricia Pollard

### **Summary of representation:**

Strongly agrees that the site to the East of Martyrs Lane should be substituted for the safeguarded sites (in Byfleet, Mayford and Pyrford) identified in the draft site allocations DPD to meet the long term future development needs of Woking Borough between 2027 and 2040 for the following reasons:

Site Capacity to build 1,024 dwellings. There is no need to build on NZGC in order to satisfy the requirement for these dwellings.

Previously Developed Site compared to the two fields in Pyrford have been farmed for centuries and have never been built upon. They provide the rural landscape essential to the semi-rural character of the area and are extensively used as a leisure facility, whereas the Martyrs Lane site is hardly if ever used.

the Martyrs Lane site was granted planning consent, was the base for 50 Nissen Huts for an Army Camp in WW2, and was used as emergency housing for about 5 years after WW2. Today this site north of the NZGC comprises unused, uncared for and semi-derelict facilities, and overgrown woodland.

The Martyrs Lane site can link straight onto the A 320 at the McLaren's roundabout. The sites in Pyrford & Byfleet are accessed by B or C roads with traffic flowing onto the A245. The A245 is already congested and this will only increase with the Broadoaks, West Hall and Sheer House in West Byfleet. Some traffic from the Pyrford field sites is likely to flow into the already congested and narrow streets of Ripley. On any objective basis, the Martyrs Lane site should result in less traffic congestion than the other 6 sites.

The Brett Woking Green Belt Report said these fields have very low suitability for removal from the green belt, and this category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and so should be selected, on this criteria, before the fields in Pyrford. The Pyrford land is in the category Major Environmental Constraint, classified as grade 3 agricultural with some grade 2 and is identified as an 'Escarpment and rising ground of Landscape importance': this designation is protected in Woking Core Strategy CS24, whereas Martyrs Lane falls into category Minor Constraint. These fields fall into two categories, namely little or no capacity for change and low capacity for change.

The Martyrs Lane site has no local or national landscape designations and has been partially developed in the past with both military and civilian accommodation. The Martyrs Lane site should therefore be selected for safeguarded development land before the Pyrford fields.

Infrastructure One larger site of 1,024 properties should provide an economy of scale, particularly when resolving infrastructure issues like water, waste, and electricity, compared

with the other 6 separate sites spread across the borough. Moreover the major water main on the adjacent A 320 is currently being renewed and is an added benefit for the Martyrs Lane site.

The disruption to residents and traffic of a single site should be significantly less during development than that at 6 separate sites.

The land value at the Martyrs Lane site is likely to be less than the 6 original sites suggested, and this should help provide affordable housing and key worker homes needed by employers such as McLaren's and St Peter's Hospital.

Martyrs Lane, could provide a new school and a health centre, relieving pressure on current resources at West Byfleet health centre and Pyrford School which are at capacity.

Martyr's lane has better bus services than other sites. Currently the 446 runs on Chertsey Road until 22:00 in the evening and has a Sunday Service. Buses in Pyrford cease at around 18:00, Byfleet at 19:00 and Mayford at 20:00 and there are no Sunday Service. McLaren also operate an employee bus service that could contribute to Martyrs Lane connectivity services and arranging adequate services at one site will be easier than to several dispersed sites.

#### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material

consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the

Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

**Contributor Reference:** 02993/1/001

**Customer Name:** Mr And Mrs J R Pain

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford ), to meet long term future development needs of the borough between 2027 and 2040

**Officer Response:**

Support noted

**Contributor Reference:** 02994/1/001  
**Customer Name:** Mr John Cotton

**Summary of representation:**

Objects to the development of the areas in and around Pyrford including, Upshot Lane, as the areas concerned are Green Belt and have many historical features as shown in the Draft Site Allocations Development Plan Document (DPD), as well as severe limitations in terms of Utilities and Road access, Schools and Health.

If there is a real need for 1024 houses in the area, then development north of New Zealand Golf Course in Martyrs Lane would be a preferred option. Major road access to this one site exists, and would be practical as it is close to major employers, such as McLaren and St. Peters Hospital as well as the M25.

New First School and Health Centre could be built to serve this new community and affordability would be better in what must be a cheaper area compared with Pyrford.

Agrees to this development for 1024 homes but not to 3000/3500 houses on the whole site including N.Z.G.C.

**Officer Response:**

Objection to building in Pyrford including Upshot Lane and support for the land to the east of Martyrs Lane is noted.

The Consultation Paper sets out how it is anticipated that the site would enable the delivery of at least 1,200 net additional homes. It is not intended for the delivery of 3000/3500 homes. Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02995/1/001

**Customer Name:** Helen Latham

**Summary of representation:**

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Some of the Martyrs Lane site is on land which has been previously developed – which is not true of the other proposed sites.

Safeguarding one site for the future housing needs of Woking would probably mean "economies of scale" and would help to find solutions to many of the infrastructure concerns.

By contrast, as regards the two plots of land at Pyrford:

The A245 through West Byfleet & over the M25 bridge has virtually no capacity left, especially when other new development in the area is taken into account.

The Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough. This is not evidently the case for the Martyrs Lane land.

The Heritage features of the area which incorporates the two Pyrford fields includes the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a Site of Nature Conservation Interest, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area.

The landscape in Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.

Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

The representation considers the land East of Martyrs Lane is more suitable than that near Pyrford for development, as it would have less impact on the landscape, however, would prefer no further major development in the area at all.

The Woking Roads are already over capacity and we do not evidently have the infrastructure in terms of schools, hospitals, etc, to take further new residents in the area.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is

specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 02996/1/001  
**Customer Name:** Mrs Carole Blackburn

**Summary of representation:**

The representation considers that Martyrs Lane will be the best choice as it will have the least impact on Woking overall because the land is a single site

it has been previously developed, is partially derelict and less than half is needed to meet the Borough requirements.

In contrast the fields in Upshot Lane are in Virgin Green Belt, have been productively farmed for centuries and used for amenity and are fundamental to the semi-rural character of the Local Pyrford Escarpment and the village of Pyrford.

As only 1024 houses are required there is no need to build on New Zealand Golf Club land

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the

amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

**Contributor Reference:** 02997/1/001

**Customer Name:** Mrs L Hannell

**Summary of representation:**

In favour of substituting the 6 sites in the draft Site Allocations DPD with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course.

A single site would provide some alleviation of current infrastructure issues that will arise building more homes, traffic etc..

Fewer residents would be impacted with one site than by 6 individual sites.

The cost of the land in this area, compared to Pyrford would be more reasonable and therefore provide an opportunity for affordable housing and also possibly an opportunity to provide some social housing.

This site is also close to three major employers, St Peter's Hospital, the Animal and Plant Health Agency and McLaren Technology Centre.

Pyrford Primary School whilst a new build, is full to capacity with less space for children. A new development in Martyrs Lane would provide the opportunity for a new school to be built.

Also, the West Byfleet Health Centre which also serves Pyrford is at maximum capacity and a further opportunity for a new centre to be built on Martyrs Lane.

Traffic and congestion in Pyrford and the Pyrford country roads are at capacity for access to the M25/A3 and local access

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other

constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and

jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02998/1/001  
**Customer Name:** Mrs M E E Winfield

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will

only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

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The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02999/1/001  
**Customer Name:** Mr B R Winfield

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

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It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

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Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 03000/1/001  
**Customer Name:** Mrs Lesley S Speller

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will

only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 03001/1/001  
**Customer Name:** Mr Leonard F Speller

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will

only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

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The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site

Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02950/2/001

**Customer Name:** Uche Achebe

**Summary of representation:**

Essential wildlife haven and the woodland contributes greatly to the amenity of the area. We need green spaces in our towns. Horsell Common Preservation have judged the development as detrimental to local wildlife.

The current infrastructure including roads, schools and doctors cannot cope with such a great scale of development, and public transport is poor.

There are also local flooding issues likely to be made worse by the removal of such a large area from the green belt.

Development should be spread out over the borough to limit the impact on any one area.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 03002/1/001  
**Customer Name:** Yvonne Geaves

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The Martyrs Lane site would have more affordable properties build on it compared with Pyrford a thousand houses in one place a new school would have to be built. Our school in Pyrford is at capacity and adds to traffic.

The northern part of the site is well served with public transport unlike the other six sites

The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre

he northern part of the site is close to major local employers like St Peter's Hospital, Animal & Plant Health Agency and also Woking Town

Much of the northern site has already been used for non-agricultural purposes

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming

the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking

Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

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It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

**Contributor Reference:** 03003/1/001  
**Customer Name:** Valerie Roberts

**Summary of representation:**

Need to protect Pyrford from being swallowed up, Pyrford is a special village and building new houses on Upshot Lane fields would impact the area.

The infrastructure could not cope with the extra amount of homes with the additional cars.

Pyrford have existing problems with the school traffic.

The local shops could not cope with the numbers of people who would want to use them, not enough parking.

The health centre in West Byfleet is our nearest is already has not enough parking.

The representation considers Martyrs Lane site would be the better option.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 03004/1/001  
**Customer Name:** Ms Jane Groves

**Summary of representation:**

Strongly in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane excluding the New Zealand Golf Course.

All seven sites under discussion are in the Greenbelt and naturally local opposition is to be expected in all cases. However the overall impact upon the green belt countryside, local amenity, transport infrastructure, ecology and environment would be considerably less if Martyrs Lane site were substituted for the six other sites, especially in the case of the two Pyrford sites.

The Martyrs Lane site is not pristine agricultural land

The Martyrs Lane site is visually low profile, already well hidden with a low visual impact compared with the other sites.

The Martyrs Lane site is already completely surrounded by an existing busy existing urban environment and infrastructure and has previously been developed for non-agricultural purposes.

There is currently no public access to the Martyrs Lane land, this reducing the impact of its loss upon public amenity.

The northern part of the Martyrs Lane site has already recently been granted planning permission

The Martyrs Lane site is well served with public transport, unlike the other six sites

The Martyrs Lane site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre. Although traffic and congestion is a problem everywhere in the Borough, the Martyrs Lane site is far better able to cope than the combination of the six other sites.

The Martyrs Lane site is close to major local employers like St Peter's Hospital, Animal & Plant Health Agency and McLaren

A single site would provide significant economies of scale in terms of the infrastructure requirements that will arise from providing these new homes; namely more affordable homes, schools, possibly social housing, doctors surgeries, traffic volumes, waste water etc.

Similarly the disruption during development and construction would be confined to a single location and therefore be more efficient overall and simpler to control.

Part of the northern site is publicly owned land so the sale would help council tax payers

Fewer existing residents of the Woking area would be impacted with one site in the northern part than by six individual sites

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would

leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the

A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

**Contributor Reference:** 03024/1/001

**Customer Name:** Environment Agency – Judith Johnson

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 03025/1/001

**Customer Name:** Surrey County Council – Spatial Planning Team

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 03026/2/001  
**Customer Name:** Martin Grant Homes

**Summary of representation:**

There is no credible evidence to support development at Martyrs Lane. To the contrary, landscape, Green Belt, sustainability appraisal and highways evidence prepared on behalf of Woking Borough Council all confirm that development at Martyrs Lane would significantly undermine the purposes of the Green Belt, and better alternative sites exist to meet housing needs.

There is no certainty that Martyrs Lane would be deliverable. The New Zealand Golf Course does not support the safeguarding of Martyrs Lane and has requested for the land in its ownership to be removed from the proposal. There is also no evidence to demonstrate that the other landowners would support the development of the site. Without the support of the New Zealand Golf Course the proposed allocation would not work. Without this land, the rest of the site would only deliver 900 dwellings. Council Officers have said that without the Golf Course, Martyrs Lane would be too isolated to be standalone development site.

If the Council were to safeguard the Martyrs Lane site as against the other alternatives six sites, there is the likelihood that the Site Allocations DPD will be found unsound because it will fail the tests set out in paragraph 182 of the NPPF. Martin Grant Homes (MGH) has sought legal opinion, which concludes that should Woking Borough Council continue to ignore their own evidence and proceed to Regulation 19 consultation including Martyrs Lane and not MGH's site, there is a very high risk that the Site Allocations DPD will ultimately fail at Examination.

MGH has also carried out a landscape and Green Belt Statement that concludes that the Martyrs Lane site contributes to the objectives of the Green Belt by preventing urban sprawl and safeguarding the countryside from encroachment. It has carried out an ecological assessment to demonstrate that development at Martyrs Lane would result in significant adverse effects. Finally, it has prepared a Transport Note, which concludes the impact of development at Martyrs Lane on the highway network would be severe.

The MGH site is identified in the 2011 and 2014 SHLAA as deliverable and developable during the plan period, if considered to be suitable for release from the Green Belt. Martyrs Lane was not promoted as part of the SHLAA.

The Green Belt to the south of Woking which covers Mayford is identified in the Core Strategy as a broad location for long term residential development with specific sites to be released as part of the Site Allocations DPD, informed by a Green Belt boundary review.

The Council's Green Belt boundary review carried out by Peter Brett's Associates identified the MGH's sites as acceptable housing sites and recommended that they should be removed from the Green Belt to meet future housing needs. By contrast, the study recommended that the Martyrs Lane site should be retained within the Green Belt.

The draft Site Allocations DPD that was published for Regulation 18 consultation identified the MGH's sites to be released from the Green Belt and safeguarded to meet future development needs of the borough post 2026. This is supported by the Council's own evidence. The Martyrs Lane site has consistently been discounted by the Council as a suitable location for housing and has only recently been added into the consultation process, contrary to the Council Officer's recommendation and legal advice. The site has been introduced by Members of the LDF Working Group in spite of, rather than in support of, the extensive technical work that has been undertaken by the Council to prepare a sustainable Local Plan that meets the requirements of the NPPF. Each stage of the Site Allocations DPD process had discounted the Martyrs Lane site as appropriate for release from the Green belt.

The site is not within suitable walking distance of town centres (Sheerwater and Woking) and that the site has limited accessibility due to its isolated location.

Part of the site is an existing waste facility, protected under Policy DC1 of the Surrey Waste Plan 2008. The site is also partly designated as an area safeguarded for mineral extraction (Policy MC6 and MC7).

The Council should return to the evidence base approach to plan making set out in the draft Site Allocations DPD and discount Martyrs Lane as a safeguarded site.

#### **Officer Response:**

It is necessary to highlight that the decision to consult on the option of the land east of Martyrs Lane as a reasonable alternative is a legitimate one and there is evidence to justify the decision. Paragraph 182 of the NPPF deals with the examination of Local Plans. It stresses that to be found sound, a Local Plan amongst other things must be justified. The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It would have been irresponsible of the Council if it did not at least consider the land east of Martyrs Lane as a reasonable alternative in the light of the changing circumstances regarding the part of the land in the ownership of McLaren which occurred after the Regulation 18 consultation and when the Green Belt boundary review was carried out. The delivery of the Core Strategy will impact on all aspects of life of people who live and work in the borough. In this regard, Members and Officers of the Council has a duty to familiarise themselves with all the necessary information that might be relevant to inform their decisions about the Site Allocations DPD, which is one of the key means for delivering the Core Strategy.

Officers accept that previous evidence gathered by the Council supported the safeguarding of the six sites including the sites in the ownership of Martin Grant Homes and discounted the land east of Martyrs Lane as potential site to meet future development needs of the borough. The Council broadly followed the recommendations of its evidence and the draft Site Allocations DPD reflects that. However, it is also a fact that representations received as a result of public consultation is a significant source of relevant evidence, and given that it is legitimate for the Council to carry out the consultation exercise, it is critical that any evidence gathered as a result of that is taken into account before decisions on the preferred approach to

safeguarding are taken. The overall goal of the Site Allocations DPD is to identify the most sustainable sites for development when compared against other reasonable alternatives. The Council will have to balance the information it receives from the consultation with its previous evidence to inform its decisions to achieve this goal.

The availability of the land will be a material consideration for its deliverability as highlighted by footnote 11 of the NPPF. It is acknowledged that if safeguarded, the land will be required for development between 2027 and 2040 and the NPPF highlights the prospect that the housing will be delivered on the site within five years. The New Zealand Golf Course has made representation to confirm that the Golf Course will not be made available for future housing development between 2027 and 2040. McLaren has also made representations to clarify that they do not object in principle to the safeguarding of the land to meet future development needs on condition that the part of the land in their ownership is allocated as a strategic employment site to meet the specific business needs of McLaren. Without both parcels of land, it would be unlikely that 1,200 new dwellings will be achieved on the site. This is a matter that the Council has to take into account when deciding its preferred approach to safeguarding. The ultimate goal that should drive the Council's decisions should be the need to achieve sustainable development and the robust evidence to justify its decisions. In this regard, if the Council decides on the available evidence that the Martyrs Lane site is the most sustainable when the available evidence has been considered, the lack of availability of parts of the land should not be an absolute constraint to the development of the entire land. The Council has Compulsory Purchase Powers that it could use to acquire land, and the appropriate legal advice will be sought if necessary. In accordance with paragraph 182 of the NPPF, the Council will only submit a Site Allocations DPD for Examination that it considers sound to avoid the risk of it being found unsound, acknowledging that the judgment on soundness is in the gift of the Independent Inspector of the Secretary of State.

Officers would not disagree that the development of the land east of Martyrs Lane would lead to urban sprawl and an encroachment into the countryside. The Council has carried out studies that leads to that conclusion, and is a material consideration that will be taken into account. The Council has also carried out a number of Transport Assessments to quantify and forecast vehicular trips that would be generated by the various safeguarding options. Overall, the assessment concludes that the scale of the forecast highway impacts varies in each of the options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or the other six sites (including the Mayford sites) are likely to exacerbate existing levels of congestion, instead of creating new one. Both options will require necessary and appropriate measures of mitigation to address forecast traffic and ensure sustainable development. It should be noted that in this particular regard, it is the cumulative impacts of the six sites that should be considered against the impacts of the Martyrs Lane site. There is no ecological evidence that is deemed as absolute constraint which will absolutely rule out the development of any of the sites being considered, acknowledging that the outcome of any detailed ecological assessment will be a material consideration that the Council has to take into account.

It is agreed that the sites in the ownership of MGH have been promoted in the SHLAA, whilst the Martyrs Lane site as a whole has not. Parts of the Martyrs Lane site have been promoted in the SHLAA. Nevertheless, the fact that a site has not been promoted in the SHLAA should not rule it out for further assessment if there is reasonable justification for the assessment. It is also agreed that the Green Belt boundary review did not recommend the release of the Martyrs Lane site for future development. The justification for the consultation on the site as a reasonable alternative has already been addressed. This same justification would apply to why the site is being considered when it was not proposed in the draft Site Allocations DPD. The LDF Working Group was clear in its recommendations about why it wanted the Council to consider the land east of Martyrs Lane as a reasonable alternative. That is a judgment that is in the remit of the Group to make. The ultimate decision about the Council's preferred approach to safeguarding and consequently the Publication version of the Site Allocations DPD to be published for Regulation 19 consultation will rest with the Council after it has considered all the available evidence, including the consultation responses.

The representation has suggested that the Council had sought legal opinion which supported the safeguarding of the six sites. It is important to clarify that this is not exactly the case. The legal opinion that was sought was about the principle of safeguarding and not about which sites should be safeguarded. Contrary to the representation, it is also clarified that the Core Strategy does not identify the south of Woking as a broad location for long term residential development. The Core Strategy identifies the whole Green Belt as broad location for future growth and requires a comprehensive review of the entire Green Belt with the view to identifying the most sustainable sites for development. This approach to the Green Belt boundary review was debated at the Core Strategy Examination and supported by the Inspector. Figure 3: Areas identified for growth of the Core Strategy provides a clear illustration of this.

The Council recognises the contribution that the community recycling centre makes towards its objective to maximise recycling in the borough. Its retention in situ, as part of a master planning of the site or a new facility at an enhanced location will be made a key requirement of the allocation of the site when the Core Strategy and/or the Site Allocations DPD is reviewed. The County Council who owns the facility is supportive of this approach. The owner of the land safeguarded for minerals extraction has submitted a representation as part of the Martyrs Lane consultation, and has indicated support for the site to be safeguarded to meet future housing needs of the Council. In this regard, the land would be available for future housing needs subject to further discussion with the County Council on whether or not the site will continue to be needed for their future purposes. At this stage the County Council is unsure about the future need of the site for their purposes until further assessment is undertaken as part of the emerging Surrey Waste Local Plan. Officers will continue to liaise with the County Council on this matter, and are confident that a consensus could be reached.

**Contributor Reference:** 03027/1/001  
**Customer Name:** McLaren Technologies Group LTD

### **Summary of representation:**

McLaren supports the safeguarding of the land east of Martyrs Lane to meet future development needs as long as the proposal is clear to emphasise that the safeguarded land is for the long term housing and employment needs within the borough and the land in its ownership is identified only for strategic employment use for its specific purposes. The inclusion of the McLaren owned land within the safeguarded boundary without a clear policy for its separate use to meet its needs would have the potential to frustrate any future development aspirations for the site, which McLaren may wish to bring forward during the current plan period. McLaren's business needs far outpace the planning process, and therefore would request that the land is made available to meet its business needs as and when it is needed. Its development should not be restricted by the 2027 – 2040 timeframe. The safeguarding of the site for housing will prejudice the future aspirations of the company.

The benefits of allocating the McLaren site for strategic employment use would support the delivery of the Core Strategy, and clearly aligns with the intended purpose of the Site Allocations DPD.

Despite the stated purpose of the Site Allocations DPD being to allocate land for a range of uses, the McLaren Campus has not to date been proposed to be allocated as a strategic employment site irrespective of the obvious justification and benefits for doing so.

The allocation of the McLaren site for employment purposes to meet its needs will still require any development proposals to be fully assessed against the Local Plan and take into account the views of statutory consultees and other interested parties. However, application for development proposals would not have to be justified by special circumstances grounds anytime they are submitted.

The purpose of the Site Allocations DPD is to allocate land for a range of uses, and yet the focus is on housing without due regard for key strategic land uses such as employment and McLaren's needs. There is a danger of not maximising a significant opportunity to support key strategic land uses within the borough.

The McLaren's land within the Martyrs Lane proposal has an extant planning approval for a high quality office and research park. Its retention for quality office and/or research premises is important as no other similar sites are available within the borough. The site is suitable for employment use and well contained in its landscape context. McLaren has undertaken a landscape assessment to demonstrate that the development of the site can be accommodated without significantly impacting upon the surrounding landscape character and visual amenity. The site has already been tested against the purposes of the Green Belt. The allocation of the site would establish a policy-led approach to supporting important employment sites within the Green Belt.

McLaren is a highly successful, dynamic and rapidly growing group of companies. It is important to the local, regional and national economy. Its designation within the Green Belt creates greater uncertainty for its growth and expansion needs as each proposal has to be called in by the Secretary of State and justified by special circumstances. In the wider political and economic context, local planning policy should recognise and encourage the further sustainable development of this important economic driver. The site is already an existing developed site in the Green Belt. It is therefore considered unnecessary for any future development proposal to continue to be justified by special circumstances.

McLaren supports sustainable working practices, reduces associated pollution and minimises impacts on the highway network through removing travelling between sites and allowing effective sustainable transport solutions to be established as a result of economies of scale.

McLaren has proposed three options for the Council to consider. It has also proposed an allocation policy setting out the key requirements for development of the site to be acceptable. This is contained in their representation. The three options are set out below:

- o The removal of the campus from the Green Belt and allocation as a strategic employment site;
- o The removal of the eastern site from the Green Belt as part of Martyrs Lane safeguarded proposal, and allocation of the western site as a strategic employment site;
- o Allocation of the campus as a strategic employment site.

#### **Officer Response:**

In accordance with Section 15 of the Planning and Compulsory Purchase Act 2004, Woking Borough Council has prepared a Local Development Scheme (LDS) that has committed the Council to prepare amongst others the following distinct but interrelated Development Plan Documents each with a specifically stated purpose:

- o The Woking Core Strategy (adopted 2012) – a strategic document setting out the Vision and Spatial Strategy for meeting known and anticipated development requirements to 2027, including number of dwellings required;
- o Site Allocations Development Plan Document (DPD) – to identify and allocate sites for development. In particular, sufficient employment and housing land and infrastructure to cover the period to 2027, in accordance with requirements, vision and spatial strategy set out in the Core Strategy;

The LDS requires the Site Allocations DPD to be in general conformity with the Core Strategy. Policy CS1: A spatial strategy for Woking Borough of the Core Strategy identifies the Green Belt and the Town Centre as broad locations for the future direction of growth to meet housing need between 2022 and 2027. It requires the Council to undertake a Green Belt boundary review to make sure that the release of Green Belt land does not undermine its purposes and integrity. Accordingly, the Council has carried out the Green Belt boundary review and its outcome is part of the evidence base being used to inform the preparation of the Site

Allocations DPD. Specific attention is drawn to the policy emphasis on the Green Belt being identified as future direction of growth to meet housing need. The Council has carried out an employment needs assessment to inform the Core Strategy. Policy CS1 sets out the overall quantum of employment floorspace to meet the borough's needs up to 2027, recognising that individual companies might have unique and special needs that need to be determined and addressed on a case by case basis. The Core Strategy has also established the overall spatial distribution of development across the borough and has required that the employment needs of the borough could be met within the urban area and other industrial estates without the need to allocate Green Belt land. This approach has been comprehensively discussed at the Core Strategy Examination and supported by the Secretary of State. The significant word being highlighted in this context is allocate.

Policy CS15: Sustainable economic development of the Core Strategy provides the policy framework for meeting the economic needs of the area. The policy clearly emphasises that the need for further economic development floorspace will not necessitate the allocation of greenfield land for employment use. The existing employment estates are protected to meet projected need and are capable of accommodating future requirements. Policy CS15 re-enforces the overall spatial strategy not to allocate Green Belt land for employment uses. There is therefore no ambiguity that the Site Allocations DPD is not intending to allocate employment uses in the Green Belt. To do otherwise would put the Council at risk for preparing a Site Allocations DPD that is not in general conformity with the Core Strategy.

The Martyrs Lane consultation had a specific purpose of consulting on the possibility of safeguarding the land east of Martyrs Lane to enable the delivery of 1,200 new homes. Therefore, whilst the Council does not doubt the significance of McLaren to the local, regional and national economy, the Site Allocations DPD has a clear purpose, which does include the allocation of Green Belt land for employment uses (safe to highlight that Broadoaks is a policy carried forward from the Core Strategy). The overall employment strategy of the Core Strategy can be met without the need to allocate Green Belt land. This does not mean that the individual needs of companies such as McLaren will be ignored if a specific proposal is put before the Council for consideration. The Council will respond to such needs on a case by case basis, and there is historic evidence of how the Council has worked constructively with McLaren to achieve their business needs at their existing location in a sustainable manner. The constructive and positive approach taken by the Council to looking at such proposals on a case by case basis is likely to continue in the future.

The NPPF is clear on the circumstances for altering the Green Belt boundary. Once established, the Green Belt boundaries should only be altered in exceptional circumstances. Based on the provisions of the Core Strategy as highlighted above, at the strategic level, special circumstances justification would not exist to allocate land in the Green Belt for strategic employment uses. The Site Allocations DPD allocates a range of sites to meet the overall employment needs of the area. The approach taken in the Site Allocations DPD is in line with the spatial strategy of the Core Strategy. This does not rule out the consideration of a proposal on a case by case basis on the merits of a specific proposal.

The construction of new buildings in the Green Belt is inappropriate except for those types of development and use defined in paragraphs 89 and 90 of the NPPF. It is therefore reasonable to expect McLaren to justify each proposal by special circumstances to accord the objectives of these policies their due. It would also be unreasonable to allocate the McLaren land holding within the Martyrs Lane proposal as a Major Developed Site in the Green Belt because it would not meet the definition of a Major Developed Site in the Green Belt as defined in the Glossary of the Core Strategy.

It is acknowledged that the McLaren site has an extant planning approval for a technology centre (60,000 sqm). However, the approval is on a condition that it will be revoked if a similar proposal approved to consolidate their activities at their existing campus is implemented. In this regard, it is not envisaged that the lack of allocation of their land east of Martyrs Lane would compromise the certainty of their short to medium term growth aspirations.

The McLaren site is in a sensitive location, washed over by the Green Belt. It is adjacent to the Thames Basin Heaths Special Protection Area, and the surrounding landscape contributes to the setting of the borough. Nevertheless, whilst the site has not been allocated for employment purposes, the Council has positively responded to the growth requirements of the company when it could be justified. It is important that future development proposals on the site are appropriately justified to ensure the continuing protection of the purposes of the Green Belt and the other environmental features in the vicinity. Judging this on the merits of each proposal offers the appropriate level of scrutiny to ensure the sustainable development of the campus. The Council understands the frustration expressed by McLaren in having to make a special circumstances case for each proposal. However, it needs to balance that with its responsibility to protect the Green Belt and ensure the sustainable development of the borough.

The Council will continue to work constructively with McLaren to meet their business needs and consolidate their operations in Woking. The Council believes that the merits of continuing to seek special circumstances justification for future development of the site far outweigh the request to allocate the site for strategic employment uses. It is not envisaged that the decision not to allocate the site has significantly constrained the growth of the company to date.

**Contributor Reference:** 03028/1/001

**Customer Name:** Mr F. West, Mr D. West, Mr K. West, West Estates Ltd

**Summary of representation:**

- o The plan should identify a supply of specific deliverable sites to meet Woking Borough Council's (WBC) objectively assessed housing needs up to 2027, however, it is evident that this is not the case and accordingly this will exacerbate future development needs.
- o Woking Borough Council should consider revising Green Belt boundaries consistent with the policies of the NPPF in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test.
- o WBC should recognise the need to identify safeguarded land to meet development needs beyond the plan period given the failure of the current development plan to plan positively for the borough's objectively assessed development needs.
- o WBC should not include land which it is unnecessary to keep permanently open.
- o WBC should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.
- o The WBC's Green Belt boundary review recognises that the land west of Byfleet makes a limited contribution to Green Belt purposes and accordingly the release of the sites will not give rise to significant harm in Green Belt policy terms.
- o The Byfleet sites are suitable for residential development with no insurmountable or technical constraints.
- o The Byfleet sites are located within a sustainable location, suitable to accommodate new development in line with the adopted spatial strategy for the borough. The Core Strategy identifies Byfleet as a key location for development due to its overall sustainability credentials, including its accessibility to local services and facilities.
- o The Byfleet sites are available for development now and are being actively promoted by a willing landowner.
- o Residential development of the Byfleet sites is confirmed to be a viable opportunity.
- o The Byfleet sites should be treated as a deliverable source of housing land beyond 2027 that may be safeguarded for release from the Green Belt without undermining the purposes of the Green Belt.
- o WBC Green Belt boundary review recognises that the land east of Martyrs Lane makes a critical contribution to the purposes of the Green Belt and accordingly its release would give rise to significant harm in Green Belt policy terms.
- o The land east of Martyrs Lane performs less well against standard suitability indicators such as traffic, ecology, landscape and flood risk compared with previously identified safeguarded sites. The land east of Martyrs Lane is subject to some significant statutory designations constraining development at this location. Given the scale of the proposed development at the site, it is considered that significant mitigation measures would be required to avoid potential harm to the identified adjacent sensitive receptors which could render the development unviable. No evidence has been presented to demonstrate development viability. The outcome of the Council's transport assessment found that the traffic impacts of developing the Martyrs Lane site will be far greater than the options considered in the draft Site Allocations DPD due to the scale of the development envisaged.

- o The land east of Martyrs Lane is not located in a sustainable location and development at this location would not conform to the adopted Core spatial strategy for the borough. The adopted Core strategy does not envisage directing development towards this location. The strategy set out in the Site Allocations DPD need to conform to the overarching vision of the Core Strategy and the proposed safeguarding strategy to release land east of Martyrs Lane beyond 2027 falls outside the NPPF compliant Core Strategy objectives.
- o The land east of Martyrs Lane is subject to multiple ownerships and interests and is not being actively promoted under a single vision for development. It is therefore unclear how the site might be delivered.
- o No evidence is presented confirming the potential residential development of the Martyrs Lane site as a viable opportunity.
- o The land east of Martyrs Lane should not be treated as the sole deliverable source of housing land beyond 2027 given the constraints identified and conflicts with the core purposes of the green Belt.

#### **Officer Response:**

The Council has an up to date Core Strategy that has been prepared in general conformity with the NPPF. The Core Strategy makes provision for the delivery of 4,964 net additional dwellings between 2010 and 2027, an annual average of 292 dwellings. Any suggestion that the failure to meet the objectively assessed housing need means that the Core Strategy was not positively prepared would be incomplete interpretation of the provisions of the NPPF, in particular, paragraph 47. The Site Allocations DPD seeks to identify specific deliverable sites to enable the comprehensive delivery of the Core strategy housing requirement. The Council acknowledges that its objectively assessed housing need is 517 dwellings per year. The NPPF requires the Council to use its evidence to ensure that the Local Plan meets in full objectively assessed need for market and affordable housing in the housing market area, as far as is consistent with policies set out in the NPPF. The Core Strategy has been examined against the policies of the NPPF taken as a whole and found sound. It would therefore be unreasonable to suggest that the Site Allocations DPD should plan to meet the objectively assessed housing need for the area. In any case, it will not be the role of the Site Allocations DPD to reset the housing requirement without the proper assessment of its impacts on jobs and infrastructure provision. The setting of the housing requirement is the sole role of the Core strategy as set out in the Local Development Scheme. Based on historic housing delivery for the last 10 years and on a number of assumptions, the Council has projected that it will continue to enable the delivery of 292 dwellings between 2027 and 2040, whilst acknowledging that an exact housing requirement can only be confirmed during the review of the Core Strategy and based on up to date evidence and policy context at the time. The approach to safeguarding should therefore be seen in this context. Against this backdrop, the Core Strategy was positively prepared and provides the necessary and appropriate strategic policy context for the preparation of the Site Allocations DPD.

The overall objective of the planning system and of the Core Strategy is to help achieve sustainable development. The Site Allocations DPD has been prepared in general conformity to the Core Strategy with the same overall objective. Regarding the Site Allocations DPD, meeting

this goal in addition to the purposes of the Green Belt would include consideration of evidence and factors such as the outcome of the sustainability appraisal, proximity of sites to key services and facilities to minimise the need to travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect and feasibility for mitigating development impacts. It is also about creating sustainable places that links homes to jobs and key facilities and services by sustainable modes of travel. The decision of the Council regarding the preferred approach to safeguarding for the purposes of the Regulation 19 consultation will rest on balancing all the above factors, using the available evidence. The overriding special circumstances justification for the release of Green Belt land to meet future housing need has been scrutinised and established by the Core Strategy. The goal of the Site Allocations DPD as defined in Policies CS6 and CS10 of the Core Strategy is to identify land in the most sustainable locations when compared against all other reasonable alternatives.

The Council has recognised the need to plan beyond the Core Strategy period. The whole essence of safeguarding land in the Site Allocations DPD is to enable long term future development needs beyond the Core Strategy period to be met without having to review the Green Belt boundary again during this plan period. This is positive planning in line with the requirements of paragraph 85 of the NPPF. The approach taken in preparing the Site Allocations DPD will help ensure the enduring permanence of the Green Belt boundary well beyond the current plan period.

The Council has gathered a significant body of evidence through various studies such as the Green Belt boundary review, Transport Assessment, Habitats Regulations Assessment to make sure that any land that is released from the Green Belt does not undermine its overall purpose. Implicitly, only land with no or minimum impact on the purposes of the Green Belt will be released for future.

Based on the conclusions of the Green Belt boundary review, it is accepted that the Byfleet sites does not perform any critical or major Green Belt purposes. This is a material consideration that Council will take into account to inform its decisions. It is stressed that the assessment of the purposes of the Green Belt is only one of a number of material consideration which will inform the Council's preferred approach to safeguarding. Some of the other factors that are likely to be taken into account are listed above.

The Council accepts that there are no absolute technical constraints for developing the Byfleet sites. The sites are in close proximity to the Byfleet Local Centre and the Council is aware that the sites have been promoted for residential development in the SHLAA and will be available for future development. It is not envisaged that there will be viability constraints that will prevent the sites coming forward when required to meet development needs. All these factors are material consideration the Council will take into account to inform its decisions.

Paragraph 80 of the NPPF defines the five purposes of the Green Belt. Of particular relevance to this representation are:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

The Council has carried out the following two studies that assessed the site against the above purposes of the Green Belt.

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the studies, the Council would agree with the representation that the development of the land east of Martyrs Lane would lead to a degree of urban sprawl and a potential perception of towns merging. This is a matter the Council will have to weigh in the balance in its decision about the preferred approach to safeguarding. It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development. Each policy in the NPPF including the Green Belt policies such as paragraph 80 are therefore servant to the overall goal of achieving sustainable development. Sustainable development is the overall goal of the Core Strategy and decisions about its delivery must also be seen in that context. The Government's definition of sustainable development in the context of the planning system is 'the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18 – 219 of the NPPF. Planning judgments must therefore be holistic and should seek to balance the Green Belt policies with all other policies with sustainable development as the ultimate goal. Regarding the spatial distribution of development across the borough and the Site Allocations DPD in particular, meeting this goal in addition to the purposes of the Green Belt would include other evidence and factors such as the sustainability appraisal, proximity of sites to key services and facilities to minimise the need to travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect and feasibility for mitigating development impacts. It is also about creating sustainable places that links homes to jobs and key facilities and services by sustainable modes of travel. The decision of the Council for the purposes of the Regulation 19 consultation will rest on balancing all the above factors, using the available evidence.

There are benefits and disbenefits for safeguarding any of the proposed options for safeguarding. Officers accept that regarding how the sites performs against the purposes of the Green Belt and landscape setting, the Martyrs Lane site appears to performs worse than the Byfleet sites. However, there are no ecological constraints at both options that could not be mitigated. Development at Martyrs Lane will only be concentrated on the part of the land in Flood Zone 1. This is made clear in the consultation document. The areas in Flood Zones 2 and 3 are included in the safeguarding area to ensure a defensible Green Belt boundary. As far as flood risk is concerned, there is no obvious significant difference between the two options.

It is too simplistic to suggest that the transport impacts for developing the Martyrs Lane site will be far greater than the options considered in the draft Site Allocations DPD. Any comparison of transport impacts should be between Martyrs Lane and the cumulative impacts of the six sites (rather than with each of the six sites). The Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future

development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure sustainable development.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The Council has carried out a viability assessment to underpin its Community Infrastructure Levy Charging Schedule. Various development scenarios were tested and based on the

outcome of the assessment, the Council is broadly satisfied that the land at Martyrs Lane could be developed to achieve positive viability. The CIL viability assessment took into account the burden that the policies of the Core Strategy impose on development, including the need for development to be supported by adequate infrastructure. It is expected that the nature and scale of infrastructure that may be needed to support development at various sites might be different taken into account site specific and locational characteristics. However, overall, it is unlikely that the provision of the infrastructure will make the development of any of the sites unviable.

The Core Strategy does not rule out the land east of Martyrs Lane as suitable location for development. Figure 3 of the Core Strategy illustrates the broad location for growth which will form the area of search for the purposes of releasing land from the Green Belt. It is misleading to suggest that the location would not conform to the adopted core spatial strategy for the borough. If the Council is to safeguard the land east of Martyrs Lane, it will be in general conformity with the spatial strategy for the borough.

The Council is aware that the land east of Martyrs Lane is in multiple ownership and will require land assembly to enable the comprehensive development of the land. Some parts of the land have been promoted through the Strategic Housing Land Availability Assessment and are likely to be available for future development. The New Zealand Golf Club has made representations as part of the consultation and has confirmed that the golf course will not be available for safeguarding. McLaren has also made representations. Whilst it does not object to the principle of safeguarding the land for future development, it wants the land in its ownership to be allocated as a strategic employment land to meet its specific development requirements. In accordance with footnote 11 of the NPPF, the Council is mindful of the importance of land availability to the deliverability of sites, and will be taking that into account in its decisions. If the Council deems the land at Martyrs Lane to be the most sustainable when compared against the others, then it has compulsory purchase powers that it may choose to use, and a legal opinion will be sought in that regard if necessary.

The Council is seeking to safeguard land in the most sustainable location to enable the delivery about 1,200 new homes between 2027 and 2040. Any option that the Council decides to safeguard should meet this test.

**Contributor Reference:** 03005/1/001  
**Customer Name:** Mr Josh Warby

### **Summary of representation:**

Strongly in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane excluding the New Zealand Golf Course.

All seven sites under discussion are in the Greenbelt and naturally local opposition is to be expected in all cases. However the overall impact upon the green belt countryside, local amenity, transport infrastructure, ecology and environment would be considerably less if Martyrs Lane site were substituted for the six other sites, especially in the case of the two Pyrford sites.

The Martyrs Lane site is not pristine agricultural land

The Martyrs Lane site is visually low profile, already well hidden with a low visual impact compared with the other sites.

The Martyrs Lane site is already completely surrounded by an existing busy existing urban environment and infrastructure and has previously been developed for non-agricultural purposes.

There is currently no public access to the Martyrs Lane land, this reducing the impact of its loss upon public amenity.

The northern part of the Martyrs Lane site has already recently been granted planning permission

The Martyrs Lane site is well served with public transport, unlike the other six sites

The Martyrs Lane site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre. Although traffic and congestion is a problem everywhere in the Borough, the Martyrs Lane site is far better able to cope than the combination of the six other sites.

The Martyrs Lane site is close to major local employers like St Peter's Hospital, Animal & Plant Health Agency and McLaren

A single site would provide significant economies of scale in terms of the infrastructure requirements that will arise from providing these new homes; namely more affordable homes, schools, possibly social housing, doctors surgeries, traffic volumes, waste water etc.

Similarly the disruption during development and construction would be confined to a single location and therefore be more efficient overall and simpler to control.

Part of the northern site is publicly owned land so the sale would help council tax payers

Fewer existing residents of the Woking area would be impacted with one site in the northern part than by six individual sites

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593

operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

**Contributor Reference:** 03006/1/001  
**Customer Name:** Christiane Mackie

**Summary of representation:**

The building of new homes on land north of the NZGC would be largely hidden and therefore offer a lower impact to the local area than the Pyrford fields which are adjacent to the ancient sites of both Pyrford Church and also the monument at Newark Lane.

Pyrford School and West Byfleet Health Centre are both fully subscribed and would therefore offer no further capacity for education or health care for new homes.

Traffic along the Old Woking Road A245 through West Byfleet to the M25 bridge is at capacity. Building on the Pyrford fields would exacerbate this where as building north of the NZGC has more access to the motorway and Chertsey.

Any further building would increase pollution caused by further stationary traffic and greater inaccessibility.

Planning has to be responsible and accountable to it's community.

**Officer Response:**

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Whilst the representation notes that the development should be north of the New Zealand Golf Course and should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings

will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);

- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

The Council and its Planning Services exercises all of its powers and duties in accordance with the law and the Council's Constitution. The purpose of the Constitution is, amongst other things, to enable the Council to provide leadership to the community in partnership with citizens, businesses and other organisations. The Core Strategy sets out the overall approach to managing development and change in the Borough, and public involvement was integral to its preparation. Whilst the vision of the Core Strategy – including the delivery of approximately 5,000 additional dwellings – might not satisfy everyone, the Council believes that it strikes a good balance between all the conflicting needs and aspirations for the Borough. The Council is committed to preparing a Site Allocations DPD to allocate specific sites to meet the proposed level of development set out in the Core Strategy, and this includes sites in the Green Belt in order to meet housing needs of the future community of the Borough beyond 2027. A key objective in carrying out this consultation exercise, as well as additional consultation exercises such as the recent 'Regulation 18' consultation, is to determine the views of the local community on future development plans. Representations received during the consultation will provide useful information to inform Members on their preferred approach to safeguarding, and thus help the Council to be even more accountable to its community.

**Contributor Reference:** 03007/1/001  
**Customer Name:** Mr Bill Ashpitel

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

The land to the east of Martyrs Lane has been partially developed before and is an area with good infrastructure.

The A245 is already close to full capacity so any new development in Byfleet and Pyrford is very likely to lead to the A245 being overloaded.

The Green belt area south of Pyrford are fully accessible and used by many of the residents from all areas of the borough, this is not true of the land to the east of Martyrs lane.

Using the land to the east of Martyrs lane will have the advantage of being a single site which would allow local amenities to be incorporated into the design.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 03008/1/001

**Customer Name:** Mr A Hannell

**Summary of representation:**

In favour of substituting the 6 sites in the draft Site Allocations DPD with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course.

A single site would provide some alleviation of current infrastructure issues that will arise building more homes, traffic etc..

Fewer residents would be impacted with one site than by 6 individual sites.

The cost of the land in this area, compared to Pyrford would be more reasonable and therefore provide an opportunity for affordable housing and some social housing.

This site is also close to three major employers, St Peter's Hospital, the Animal and Plant Health Agency and McLaren Technology Centre.

Pyrford Primary School is full to capacity. A new development in Martyrs Lane would provide the opportunity for a new school to be built.

The West Byfleet Health Centre which also serves Pyrford is at maximum capacity and a further opportunity for a new centre to be built on Martyrs Lane.

The Pyrford roads and country roads are at capacity, being used for access to the M25/A3 and local access.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without

the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site

Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 03009/1/001  
**Customer Name:** Mr David Niven Reed

**Summary of representation:**

The land to the east of Martyr's Lane is not suitable for development.

The land to the east of Martyr's Lane is Green Belt land. Green Belt land is important to restrict urban sprawl and protect the countryside.

The A320 Chertsey Road, Guildford Road, Woodham Lane, and Martyr's Lane, as well as the other roads around the area, are already congested. The additional traffic generated by a housing development on the Martyr's Lane site would significantly worsen the traffic situation.

The land to the east of Martyr's Lane contains areas that are prone to flooding.

The representation considers that the other 6 sites mentioned are also not suitable for development as they are on Green Belt land. Encroaching on Green Belt land little by little is not the answer. Housing development should be carried out either urban brownfield sites or in the form of multi-storey apartment buildings, 6 storeys or higher, in the town centre to bring life and commerce back to the town centre.

**Officer Response:**

Objection for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The Council has carried out two relevant studies:

- Woking Green Belt review (2013) by Peter Brett Associates; and
- Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land

has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character’.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett’s report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council’s ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The Council is fully aware of local resident’s concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. The land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of

the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. By releasing Green Belt land for future development, the Council also has to make sure that there is a strong defensible Green Belt boundary. The areas of the land covered by Flood Zones 2 and 3 are included within the safeguarded designation to make sure that there is a strong defensible Green Belt boundary. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this. Based on the above, it is not envisaged that the occupants of the development on the site would face unacceptable risk of flooding.

The Council have comprehensively assessed brownfield sites as part of the evidence to inform the Site Allocations DPD. The Council has published detailed information on previously developed land (brownfield land) that is suitable, available and achievable for housing and employment purposes. This is contained in the Strategic Housing Land Availability Assessment (SHLAA) (2015), the Employment Land Review (2009) and Employment Topic Paper (2015). The documents are on the Council's website at [www.woking.gov.uk](http://www.woking.gov.uk). The Council has also carried out and published a Sustainability Appraisal Report that assesses all reasonable alternative brownfield sites in a consistent manner against a set of sustainability objectives, including environmental, social and economic objectives. The available evidence on previously developed land is sufficiently comprehensive and robust enough to enable informed decisions about the preferred sites being proposed for allocation in the DPD. The evidence also demonstrates that the preferred sites are the most sustainable when compared against other alternative sites. It is important to highlight that there is no presumption that land which is previously developed is necessarily suitable for residential development. Officers will consider any other sites that will be suggested for consideration in response to the Regulations 18 and 19 consultations on the DPD.

There is a considerable number of sites within the draft site allocations DPD within the town centre which contribute to Policies CS1 and CS2 of the Core Strategy.

**Contributor Reference:** 03010/1/001  
**Customer Name:** Shirley Selden

**Summary of representation:**

Object based on:

Loss of green belt

Urban Sprawl

Flood risks

Road transport – A320 and pressure on other local roads

Lack of public transport

Infrastructure pressure e.g. no plans for new school, hospitals etc

Wildlife loss of habitat

Loss of trees and woodlands

Martyrs Lane recycling centre is essential and should remain

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 03011/1/001

**Customer Name:** Mr Christopher Wilmshurst – Vail Williams

**Summary of representation:**

Vail Williams, in collaboration with Seymours Land and New Homes, act on behalf of the owners of Durnford Farm and Little Durnford; Mellow End; Woodham Court House and Woodham Court which fall within the East of Martyrs Lane site.

The owners of the above sites all support the allocation of Land east of Martyrs Lane for future development needs in the period 2017 – 2040 and confirm that their land is both available and developable.

There is more certainty that a single site will deliver development as it is likely to be within the control of a single developer, or a small number, and therefore more likely to come forward within expected timescales rather than reliance upon a series of smaller sites with differing ownerships

Deliverable – a large single site is more likely to come forward for development when required rather than a series of smaller sites each working to their own timescales and owner aspirations;

Contributions – a large single site will generate a significant scale of contributions and infrastructure which will generate significant benefits to the wider population;

Less impact on openness – a single site will have a focused impact on the green belt which can be mitigated through design and landscaping whereas a series of smaller sites will each have an impact on the green belt leading to piecemeal erosion of openness;

Sustainability– a single large site can be developed as a single self contained sustainable location providing a sustainable mix of uses including residential, employment and community facilities to meet the needs of new residents as well as those already living in the area.

**Officer Response:**

Support and availability of parts of the land to the east of Martyrs Lane is noted.

Paragraph 182 of the NPPF deals with examination of local plans. It requires the Council to only submit a plan for examination which it considers sound. Amongst other things, to be sound, the plan:

- o Should be deliverable over its period;
- o Should be the most appropriate strategy when compared against the reasonable alternatives, based on proportionate evidence.

Footnote 11 of the NPPF provides clarity on what a deliverable site is. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Whilst five years is emphasised in the footnote, its relevance should be seen in the context of the details of the representations received from the owners of the land.

The New Zealand Golf Course has written to the Council and has made formal representation as part of the consultation to confirm that the part of the land that is in its ownership will not be made available now, in the future and never to meet future development needs. In this regard, there is no expectation for a change in their position within and beyond five years. The representations from the New Zealand Golf Course are addressed in full separately.

McLaren Technologies Group Limited has also made representations. Whilst it would generally support in principle the release of the land from the Green Belt, it would only allow its land holding to be used as a strategic employment site to support its own future expansion programme. McLaren will not allow its land to be used as envisaged in the consultation. If the Council were to decide not to release the land east of Martyrs Lane from the Green Belt, McLaren have provided reasons why its land should be designated as a Major Developed Site in the Green Belt. The representations from McLaren has been addressed in full separately.

The lack of availability of the above sites could cast doubt on the deliverability of the land as a whole if it is safeguarded. To put it into context, assuming the two sites will not be available to meet future development needs and the Surrey County Council's Waste Safeguarded Site is also not available, the residual land (including the sites referenced in the representation) will only deliver about 300 dwellings (at 30 dph) as against the 1,200 dwellings that the Council wish to safeguard land. If the Waste Safeguarded Site is made available, there will be sufficient land to enable the delivery of about 600 dwellings at the same density. This is still significantly short of what is needed. Importantly, the Council has to make sure that any land that it safeguards would not lead to an isolated development within the Green Belt.

It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the land is the most sustainable when compared with the original six safeguarded sites.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

The Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently of the Site Allocations DPD are managed to help achieve sustainable development. The outcome of the appraisal demonstrates that there are a number of negative, positive and neutral impacts for developing the site. The same Sustainability Appraisal Framework had been used to carry out a SA of the originally proposed six safeguarded sites. The SA Framework enables consistent information to be gathered to make comparative judgements between the sites. The Council therefore has significant information to inform decisions about the most sustainable site to safeguard for future development. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

**Contributor Reference:** 03012/1/001  
**Customer Name:** Mr Malcolm Rapps

**Summary of representation:**

The representation would like to thank the Working Group for insisting that the Martyrs Lane site should be seriously considered as a single site alternative to the current six sites in the DPD (2027 – 2040).

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

A single building site must provide economy of scale.

Parts of this Greenbelt Site have been allocated in the past to McLaren for a large factory.

The top part of the site also includes pre-developed land used as a wartime army camp.

The northern part of the site has already been used for non-agricultural purposes.

The site already has a "natural" screen from the main A320 road, and currently there is no public access to the land.

The northern part of the site has access on to the A320 via a roundabout with its direct road links to the M25 and to Woking town centre.

Local employment is provided by St Peter's Hospital; Animal & Plant Agency; McLarens & Woking Town Centre.

Recognising that all seven sites are Greenbelt, a single site of derelict/unused/lower cost area is more preferential than GB12 and GB13, a piece of Heritage ( Brett Report) beautiful countryside currently being used for farming

Far less disruption to many more people's lives in the Borough during the construction process

Also the other six DPD site areas of the Borough are already allocated for many building works in the Core Strategy requirement up to 2027; and therefore the disruption that is going to cause.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use

except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a

development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and

jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

**Contributor Reference:** 03013/1/001

**Customer Name:** Mr Paul Saper

**Summary of representation:**

This site is accessible to the M25 and A320. There is a lot of development to the south of Woking, the A320 is heavily congested. The new Hoe Valley School will add to this.

existing major employers including McLaren.

Small greenbelt sites without infrastructure.

Worplesdon station, which is reached by rural lanes, is at capacity.

The escarpment is a landscape feature that should be retained while land north of the New Zealand golf course is largely disused and derelict.

The Martyrs Lane site has significant advantages over piecemeal development of small greenbelt sites

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the

Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will work with public transport providers to improve service provision and frequency, if this site or any of the six sites were to be safeguarded for future development.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 03014/1/001  
**Customer Name:** Jeanette And Gary Goddard

**Summary of representation:**

Strongly objects to any proposed development on the green belt land of Pyrford fields. This area is of outstanding natural beauty and deserves special protection status. It is used and loved by walkers, ramblers, bird watchers, dog walkers, horse riders, school nature trails to name but a few.

The small community and country lanes cannot support 3000/3500 houses not mention another school, health centre and local amenities.

The whole area would become a gridlock for cars and lorries

A preferred site would be a single site development at Martyrs Lane where the land infrastructure would support another community development.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Consultation Paper sets out how the site would enable the delivery of at least 1,200 net additional homes to meet future housing need. It is not the intention of the Council to safeguard the land for 3000/3500 houses, as expressed in the representation.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation

is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Please note the proposed housing figures are Land rear of 79 – 95 Lovelace Drive, Teggs Lane, Pyrford (Proposal GB12 in the draft Site Allocations DPD. Anticipated capacity is 223 dwellings); and Land east of Upshot Lane and south of Aviary Road, Pyrford (Proposal GB13 in the draft Site Allocations DPD. Anticipated capacity is 200 dwellings).

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 03015/1/001  
**Customer Name:** Judy And Victor Curtis

**Summary of representation:**

Objects to building on green belt land, specifically Upshot Lane in Pyrford, and support the Martyrs Lane proposal.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

The principle of Green Belt development, including safeguarding land for future development needs, has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Objection to development proposals in Pyrford are also noted.

**Contributor Reference:** 03016/1/001

**Customer Name:** Mr And Mrs Frank And Barbara Smith

**Summary of representation:**

We support the substitution of the 6 sites for the land east of Martyrs Lane.

To accommodate all the required dwellings and necessary infrastructure, at one location on land which has no particular use or development, should be more cost effective than the development of six other sites with the complexities which will be encountered in linking in to and appropriately extending the existing infrastructure.

The development of the 6 sites will cause far more disruption to local residents and services than if the land east of Martyrs Lane is developed.

**Officer Response:**

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 03017/1/001  
**Customer Name:** Jenna Pearson

**Summary of representation:**

Objects to development on Martyrs Lane/Woodham lane.

Green Belt land here should be retained: the proposed area is currently beautiful woodland.

The site provides habitat for wildlife, and is part of what makes the area so nice to live in. The council needs to stop approving development in the Green Belt.

Transport – the area around the proposed development is already heavily congested with cars, buses, motorbike etc. Further housing in the area would make it worse.

Infrastructure – there are already difficulties in getting a place for children at schools in the area; and there are no schools in the vicinity of the site.

St Peters Hospital standard of care has declined over the years; adding additional pressure of more patients onto a struggling hospital will make things worse for those who rely on it.

**Officer Response:**

Objection to the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper (see Sections 1 and 2).

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The Council will make it an essential requirement for the site to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24:

Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of education infrastructure provision, it is not known at this stage which type and nature of provision will be required at the site. The County Council is the education provider for the area and its views will be taken into consideration if the site is safeguarded. At this early stage, the County Council has set out in its representation as part of this exercise that it believes the provision of a primary education facility would be required. At the review of the Core Strategy and/or Site Allocations DPD, the Council can make this a key requirement of developing the site if it is chosen to be safeguarded. The overriding objective of this particular

exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council also works closely with health infrastructure providers, such as the Clinical Commissioning Groups, to determine existing capacity for serving new development, and to identify future health infrastructure needs. This includes the capacity of existing hospitals to serve new development and future development in the Borough. Again, the views of the Clinical Commissioning Groups would be taken into consideration and form part of the evidence base to inform the preparation of the Site Allocations DPD.

**Contributor Reference:** 02585/1/001  
**Customer Name:** Mrs D D Bunce

**Summary of representation:**

Support the Martyrs Lane proposal.

There would be less disruption to a number of communities where the existing roads are narrow and development will result in further congestion.

The Martyrs Lane site has better access to the motorways, Woking town and station and airports. Development on one site would enable the provision of well planned road infrastructure.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development.

**Contributor Reference:** 02599/1/001

**Customer Name:** Mr Peter Noel

### **Summary of representation:**

Support for the Martyrs Lane proposal.

National policy states that brownfield and previously developed sites should be used first. Pyrford sites have been used for agriculture and are high quality agricultural land. They also form an essential part of Pyrford's environment.

Martyrs Lane was granted planning permission for a factory which is now no longer required. The site was also used for development and the area north of the New Zealand Golf Course consists of derelict buildings and uncared for woodland.

Part of the site is publically owned land so a sale would help Council tax payers.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required plus any infrastructure requirements.

Only one local improvement will be required in infrastructure.

The Pyrford sites have less justification for removal from the Green Belt than the Martyrs Lane site. They are agricultural land, part of the local rural character and are of benefit to the whole of Woking. Martyrs Lane is previously developed, unimportant and has no public access.

Pyrford houses would command a higher price and Martyrs Lane would enable the provision of low cost housing and benefit from being in close proximity to local employers.

Martyrs Lane is adjacent to a major road and roundabout. The utility services could be provided efficiently. The A320 would be able to cope with additional traffic than the roads in the east and south of the borough. The road also provides access to the M25, Woking and neighbouring towns.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

There are a number of walking and cycling routes in Pyrford unlike the Martyrs Lane site.

Significant development in West Byfleet, Pyrford and Mayford would change the nature of those areas whereas the Martyrs Lane site is well screened and development could be accommodated behind that screening.

Support the Martyrs Lane proposal as it will have the least impact on the borough and minimise disruption.

Surprised that this was not originally put forward as it has more benefits than the six original sites from a financial, disruption and aesthetic point of view.

### **Officer Response:**

Support for the Martyrs Lane proposal is noted.

As set out in the Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land for development, including safeguarding

land for future development needs, has been established in the Core Strategy and is consistent with National Planning Policy. In addition, it should be noted that the Site Allocations DPD contains over 50 sites within the existing urban areas of the borough. The Site Allocations DPD as well as the Core Strategy clearly state that land will only be released from the Green Belt for development from 2022 when it is anticipated that there will be insufficient brownfield land to meet housing needs. Overall the Council has considered and assessed about 125 sites across the Borough in preparing its Site Allocations DPD.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting

their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport

Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

As set out above, the Council has undertaken a number of landscape studies to determine the visual impact of development of all of the various Green Belt options and will be one of the key considerations that will inform the Council's decision on its preferred safeguarding option.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

**Contributor Reference:** 02517/1/001  
**Customer Name:** Ms Rosalind Saper

**Summary of representation:**

It is within easy reach of the M25 and served by the A320. The roads south of Woking are congested

South Woking has seen substantial development, in Westfield Avenue, Moor Lane and a new school. It is unlikely that a new rail bridge to ease traffic from south Woking to the Triggs Lane/Goldsworth area could be provided.

The escarpment is an important landscape feature and ought to be protected.

A larger area that could accommodate adequate amenities is preferable to small individual greenbelt sites that lack the necessary infrastructure.

As McLaren is already established as a leading company providing employment in the area and there are other employers nearby it makes sense to provide homes nearby.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the

land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02520/1/001  
**Customer Name:** Ms Barbara Cormie

**Summary of representation:**

Supports the proposal to use land north of New Zealand Golf Course on Martyrs Lane, for the development of new housing – instead of Pырford's green belt fields.

Martyrs Lane is a much more 'open' area, with much better transport links in place. As well as space to develop infrastructure as needed.

3,000 houses are not proposed but c1,000

Pырford is very much green belt – an oasis of greenery with a host of plants and wildlife that needs to be protected and preserved.

There are also pressures on our infrastructure – roads especially – that would be severely worsened by such large scale house building.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The representation is correct, the delivery of 1200 new homes is required not 3000.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a

single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

If the Council were to decide to safeguard this site or any of the six sites, the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

**Contributor Reference:** 02536/1/001  
**Customer Name:** Miss Lisa Hammond

**Summary of representation:**

A single site will create an economy of scale

It is well connected to the existing urban area. The southern boundary of the site follows Woodham Lane (A245)

The site also benefits from good defensible boundaries on all sides and therefore, unlike many of the alternative housing sites. Specifically, Martyrs Lane and Guildford Road (A325) provide a strong defensible boundary to the north, whilst the remaining site boundary is protected by a combination of flood plan and administrative boundaries.

The following paragraph attached to the end of para 2.5 should be omitted or reworded to avoid prejudging any master planning principles.

'The site contains a number of existing residential properties along Martyrs Lane and Woodham Road. However it is not proposed that these would be redeveloped but instead are included within the site boundary to ensure that a strong defensible Green Belt boundary could be drawn.'

There is no evidence at this stage that retaining existing properties helps secure strong defensible Green Belt boundaries or not, it may well be that the removal of buildings best serves this aim.

Sites GB4, GB5 and GB10 are all considered to benefit from defensible boundaries. However they are all small and therefore only have the potential to deliver limited amounts if development and planning gain measures.

GB11 – This site appears to follow arbitrary boundaries which do not appear to be defensible and would lead to infilling.

GB12 and 13 – The allocation of these sites in combination will bring considerable pressure on surrounding land for future development which in turn risks the coalescence of both Pyrford Village and Pyrford Green with Pyrford to the north and north-west.

There are no landscape or significant environmental constraints or designations which apply to the bulk of the site. Small parts of the site are undevelopable by virtue of inclusion within flood zones 2/3 and a small part of the site falls within the SPA 400m buffer zone. These constrained areas are very small and would not prevent the delivery of housing and related development and infrastructure.

The site has no significant heritage constraints including no Conservation Area designations, no Scheduled Ancient Monuments, no historic gardens and no Statutorily Listed Buildings. Only a small number of locally listed buildings are present and there is no reason why these should not be retained.

Planning permission was recently granted for the top part of the site.

Previously developed site, part of the site is a golf club, sports pitches and courts, domestic gardens, a household waste recycling centre and plant nurseries. The site has no obvious landscape or environmental merit

Many of the trees are plantation style coniferous trees which are typically non-native, have little biodiversity value and limited landscape value.

The site is well connected to major employers, existing transport routes and the centre of Woking. The development potential of a site of this size also affords viable opportunities for further and significant transport improvements which are less likely to be secured via the alternative sites.

The strategic allocation of this site will provide the Council with a robust housing land supply and has the potential to deliver around 200 more homes than the combined total of the 6 alternative sites.

The site is also in a relatively lightly populated part of the Borough and therefore its ability to impact on significant numbers of residents and other land users is reduced.

Its location, particularly relative to the primary road network and the M25 also serves to minimise the impacts of construction

The NPPF duty to cooperate further supports the allocation of this site.

#### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future

development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Green Belt boundary review report provides sufficient evidence that the release of the proposed allocated sites from the Green Belt will enable a defensible boundary to be drawn that will endure over a long period of time beyond the Core Strategy period. Where the recommendations of the Green Belt boundary review report had not been accepted by the Council, a clear reason has been given. The proposed Green Belt boundary has been drawn to follow the edge of the development sites in Mayford. For sites GB8, GB9, GB10 and GB14 there will be a continuation of the existing urban area which is well defined by Saunders Lane to the south and Egley Road to the east. The Green Belt boundary to the west has been defined by site GB11 which is adjacent to the Hook Heath escarpment. This will protect the purpose of the Green Belt and not undermine the integrity of the escarpment.

Site GB12 has a strong defensible boundary of Lovelace Drive, Teggs Lane and Upshot Lane. GB13 boundaries are Upshot Lane, a public footpath and Church Hill.

Site GB7 will continue to remain within the Green Belt and therefore the Green Belt boundary will not change in this particular location.

Regarding the representation in paragraph 2.5, the Council is not intending to redevelop existing properties within the site boundary. Nevertheless, if the Council decides to safeguard Martyrs Lane for future development needs, then these existing properties will need to be carefully considered as part of the masterplanning of the site. This would be considered in greater detail in future revisions of the Site Allocations DPD and/or Core Strategy, and at the Development Management stage.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs

Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

It is accepted that the Martyrs Lane site does not contain any absolute environmental constraints, but it does in fact contain other development constraints, such as areas of Ancient Woodland and in close proximity to Horsell Common. The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard. The Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

**Contributor Reference:** 02978/1/001  
**Customer Name:** Mrs Carole Davis

**Summary of representation:**

Strongly objects to build a minimum of 1200 houses on the site around Martyrs Lane.

Particularly because it is in a large green belt area

Destroy this area and our environment when there are several other more suitable areas for redevelopment including brown field sites and the alternative of having several smaller sites in other parts of the borough.

creating a huge urban sprawl in what is currently an area of great beauty and habitat for wildlife.

No plan either to build more schools or medical facilities. Medical centre in West Byfleet and Fullbrook School and the junior schools in the area are at capacity.

Increased traffic on the A320 and of course Woodham Lane and the surrounding roads.

Appreciates the need for more housing but to build one huge estate is very unfair to the current residents of this area.

**Officer Response:**

Objection for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using

its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council have comprehensively assessed brownfield sites as part of the evidence to inform the Site Allocations DPD. The Council has published detailed information on previously developed land (brownfield land) that is suitable, available and achievable for housing and employment purposes. This is contained in the Strategic Housing Land Availability Assessment (SHLAA) (2015), the Employment Land Review (2009) and Employment Topic Paper (2015). The documents are on the Council's website at [www.woking.gov.uk](http://www.woking.gov.uk). The Council has also carried out and published a Sustainability Appraisal Report that assesses all reasonable alternative brownfield sites in a consistent manner against a set of sustainability objectives, including environmental, social and economic objectives. The available evidence on previously developed land is sufficiently comprehensive and robust enough to enable informed decisions about the preferred sites being proposed for allocation in the DPD. The evidence also demonstrates that

the preferred sites are the most sustainable when compared against other alternative sites. It is important to highlight that there is no presumption that land which is previously developed is necessarily suitable for residential development. Officers will consider any other sites that will be suggested for consideration in response to the Regulations 18 and 19 consultations on the DPD.

The Council has carried out two relevant studies:

- Woking Green Belt review (2013) by Peter Brett Associates; and
- Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred

site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

**Contributor Reference:** 02979/1/001  
**Customer Name:** Mr David Pollard

### **Summary of representation:**

Strongly agrees that the site to the East of Martyrs Lane should be substituted for the safeguarded sites (in Byfleet, Mayford and Pyrford) identified in the draft site allocations DPD to meet the long term future development needs of Woking Borough between 2027 and 2040 for the following reasons:

Site Capacity to build 1,024 dwellings. There is no need to build on NZGC in order to satisfy the requirement for these dwellings.

Previously Developed Site compared to the two fields in Pyrford have been farmed for centuries and have never been built upon. They provide the rural landscape essential to the semi-rural character of the area and are extensively used as a leisure facility, whereas the Martyrs Lane site is hardly if ever used.

the Martyrs Lane site was granted planning consent, was the base for 50 Nissen Huts for an Army Camp in WW2, and was used as emergency housing for about 5 years after WW2. Today this site north of the NZGC comprises unused, uncared for and semi-derelict facilities, and overgrown woodland.

The Martyrs Lane site can link straight onto the A 320 at the McLaren's roundabout. The sites in Pyrford & Byfleet are accessed by B or C roads with traffic flowing onto the A245. The A245 is already congested and this will only increase with the Broadoaks, West Hall and Sheer House in West Byfleet. Some traffic from the Pyrford field sites is likely to flow into the already congested and narrow streets of Ripley. On any objective basis, the Martyrs Lane site should result in less traffic congestion than the other 6 sites.

The Brett Woking Green Belt Report said these fields have very low suitability for removal from the green belt, and this category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and so should be selected, on this criteria, before the fields in Pyrford. The Pyrford land is in the category Major Environmental Constraint, classified as grade 3 agricultural with some grade 2 and is identified as an 'Escarpment and rising ground of Landscape importance': this designation is protected in Woking Core Strategy CS24, whereas Martyrs Lane falls into category Minor Constraint. These fields fall into two categories, namely little or no capacity for change and low capacity for change.

The Martyrs Lane site has no local or national landscape designations and has been partially developed in the past with both military and civilian accommodation. The Martyrs Lane site should therefore be selected for safeguarded development land before the Pyrford fields.

Infrastructure One larger site of 1,024 properties should provide an economy of scale, particularly when resolving infrastructure issues like water, waste, and electricity, compared

with the other 6 separate sites spread across the borough. Moreover the major water main on the adjacent A 320 is currently being renewed and is an added benefit for the Martyrs Lane site.

The disruption to residents and traffic of a single site should be significantly less during development than that at 6 separate sites.

The land value at the Martyrs Lane site is likely to be less than the 6 original sites suggested, and this should help provide affordable housing and key worker homes needed by employers such as McLaren's and St Peter's Hospital.

Martyrs Lane, could provide a new school and a health centre, relieving pressure on current resources at West Byfleet health centre and Pyrford School which are at capacity.

Martyr's lane has better bus services than other sites. Currently the 446 runs on Chertsey Road until 22:00 in the evening and has a Sunday Service. Buses in Pyrford cease at around 18:00, Byfleet at 19:00 and Mayford at 20:00 and there are no Sunday Service. McLaren also operate an employee bus service that could contribute to Martyrs Lane connectivity services and arranging adequate services at one site will be easier than to several dispersed sites.

#### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material

consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the

Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

**Contributor Reference:** 02980/1/001

**Customer Name:** Mr John Clark

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will

only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site

Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02981/1/001

**Customer Name:** Isobel Jarvis

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt. Strongly objects to any development on Greenbelt as it has detrimental environmental effects as well as on living standards wherever it occurs. The approach of Central Government to "unprotect" protected land is totally reprehensible and makes a mockery of planning and general laws in this country.

However, on balance, I am in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

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The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

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Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02982/1/001  
**Customer Name:** Mr Andrew Heaton

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

Martyrs Lane site is more suited based on the Brett Woking Green Belt report which states Pyrford has Very Low Suitability for removal from the green belt rather than Low for ML. The same report also states that the Environmental constraint would be greater in Pyrford than at ML as well as the fact that the impact on the rural character of Pyrford would be greatly affected which is not the case at ML.

Whilst Goldsworth Park is bigger than what is being proposed here, it clearly demonstrates that if you build from scratch large housing developments then you can provide the services needed to make it work for the residents, as opposed to the proposed bolt on sites which will only put huge pressure on already stretched services, such as doctors surgeries, schools and traffic management.

It has been mentioned that 3500 are needed, but I am not sure where that figure comes from as the 6 sites only totals 1024 so this consultation should only be relevant to that number which fits into the area north of NZ Golf Course.

## Officer Response:

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation

is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes

shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

**Contributor Reference:** 02983/1/001

**Customer Name:** Lynn Heaton

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

Martyrs Lane site is more suited based on the Brett Woking Green Belt report which states Pyrford has Very Low Suitability for removal from the green belt rather than Low for ML. The same report also states that the Environmental constraint would be greater in Pyrford than at ML as well as the fact that the impact on the rural character of Pyrford would be greatly affected which is not the case at ML.

Whilst Goldsworth Park is bigger than what is being proposed here, it clearly demonstrates that if you build from scratch large housing developments then you can provide the services needed to make it work for the residents, as opposed to the proposed bolt on sites which will only put huge pressure on already stretched services, such as doctors surgeries, schools and traffic management.

It has been mentioned that 3500 are needed, but I am not sure where that figure comes from as the 6 sites only totals 1024 so this consultation should only be relevant to that number which fits into the area north of NZ Golf Course.

## Officer Response:

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation

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It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
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The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes

shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

**Contributor Reference:** 02505/1/001  
**Customer Name:** Mr And Mrs Angus And Davida Whimster

**Summary of representation:**

Opposed to the use of the Upshot Lane fields for housing development. Understand and sympathise with the need to create more housing but this needs to take account of the infrastructure and respect the environment.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course and should no build in excess of 1024 houses.

This site could accommodate the requirements for affordable homes and the educational and health infrastructure to support the additional homes.

Ensure that the additional housing is welcomed and appropriate not excessive and damaging to the green belt.

**Officer Response:**

Support for the land to the east of Martyrs Lane and opposition to building on Upshot Lane fields is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02974/1/001  
**Customer Name:** Alison Jackson

**Summary of representation:**

Opposed to large scale urban development on green belt open space when there is insufficient capacity for this kind of development and the traffic problems and environmental impact it will bring, and the impact it will have on local residents.

Green Belt  
Urban Sprawl and Fair Oaks  
Flood risks  
Transport – Roads  
Transport – Public  
British Geological Survey  
Achieving Sustainable Development  
Infrastructure  
Wildlife  
Woodlands

There is also large proposed developments Sheerwater development, Fair Oaks Surrey Heath, in Ottershaw, Runnymede and McLarens are due to build a 3rd building which will increase traffic.

The landscape assessment, Green Belt review of the area and Hankinson Duckett Report provide evidence for suitability.

**Officer Response:**

The Council's response on the following matters Green Belt, Urban Sprawl and Fair Oaks, Flood risks, Transport – Roads, Transport – Public, British Geological Survey, Achieving Sustainable Development, Infrastructure, Wildlife, Woodlands and landscape can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02510/1/001  
**Customer Name:** Mr Anthony Urwin

**Summary of representation:**

The proposal will result in urban sprawl, especially with the proposals at Fair Oaks and Longcross.

Impact on roads which are already congested and at capacity. The additional cars and increased flow from the Fair Oaks Garden Village Plan would impact an already congested road network. Any road network development that would alleviate any increase in traffic flow would not preserve the setting and character of the area.

Impact on emergency service response times from St Peters Hospital.

Local Infrastructure to support such a development could not be delivered and therefore would overload the existing facilities. Developments on this scale, in addition to the development at Fair Oaks would inevitably saturate local services such as hospitals, rail services and schools which already have lengthy waiting lists.

WBC would need to take on a substantial financial burden to fund any development of existing or new infrastructure to support GP surgeries, school and local hospitals.

There are zone 2 and 3 flood risk areas within the Site Allocations Plan boundary, developing the entire site would vastly increase the flood risks not only within the area but the contiguous areas. Flood events will become more frequent as greenbelt is removed and run off from new properties increases.

Flood risk assessments must be carried out but there are other areas within WBC where flood risk is much lower and distributed over a wide area would be much more suitable for development.

New Zealand Golf Course has a unique environment and home to protected animals.

Replacing the mature trees and open heathland with concrete would irreversibly change the very character of the area.

The area itself is characterised in the name 'Woodham', by a mix of Woodland and Tree Lined roads.

House affordability crisis – Building on the Green Belt to meet housing shortage is only part of the problem and not the major contributor. The larger part of the housing affordability crisis is related to the demand side by low interest rates, government policies and incentives for Buy To Let, the banking system and the housing and mortgage market.

Population distribution and urban densities should be looked at compared to other cities. Vacant properties and brownfield sites could provide homes instead of building new ones.

A failure of Government to ensure a better dispersion of development has encouraged inward migration to the South East of England and increase demand for property in localised regions of the UK.

The proposed site is adjacent to Horsell Common which is designated a Site of Special Scientific Interest, forms part of the Thames Basin Heaths Special Protection Area and is part of Natura 2000. Residential development on the scale proposed will cause a significant disturbance to the breeding of rare bird populations.

In conjunction with the adjacent development proposal at Fair Oaks and the Sheerwater development, priority should be given to development in areas where ecological harm can be avoided and the need for mitigation reduced.

#### **Officer Response:**

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper (see Sections 1 and 2). The Topic Paper also explains how the brownfield sites of the Borough were prioritised for assessment (see Section 11).

The Council's response to urban sprawl and Fair Oaks, transport and traffic, infrastructure and funding, flooding, woodland and wildlife can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

The Council will work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy.

Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

The Council notes the reasons given for the housing crisis as set out in the representation. It should be noted that these issues are outside the scope of the planning process and are closely linked to the wider UK economy and national policies set by central Government, such as buy-to-let policies. Nevertheless, the strategic Housing Market Assessment (2015) (SHMA) clearly sets out the housing need in the borough. This identified housing need has informed the Core Strategy and the Council is fully committed to its comprehensive delivery. The Site Allocations DPD is an important delivery mechanism that will help deliver the aims and objectives of the Core Strategy.

As set out in the Core Strategy, in particular policy CS1: A spatial vision for Woking Borough; CS2: Woking Town Centre and CS3: West Byfleet District Centre; the Council will support high density development in the town and district centres as they offer good access to existing services and facilities. The Core Strategy also contains policies to ensure that development across the Borough reflects local character and is of an appropriate density. The Design SPD sets this out in greater detail, and new development should comply with these guidelines in order to be supported.

**Contributor Reference:** 02578/1/001  
**Customer Name:** Ms Victoria Urwin

**Summary of representation:**

The proposal will result in urban sprawl, especially with the proposal at Fair Oaks and Longcross.

Impact on roads which are already congested and at capacity. The additional cars and increased flow from the Fair Oaks Garden Village Plan would impact an already congested road network. Any road network development that would alleviate any increase in traffic flow would not preserve the setting and character of the area.

Impact on emergency service response times from St Peters Hospital.

Local Infrastructure to support such a development could not be delivered and therefore would overload the existing facilities. Developments on this scale, in addition to the development at Fair Oaks would inevitably saturate local services such as hospitals, rail services and schools which already have lengthy waiting lists.

WBC would need to take on a substantial financial burden to fund any development of existing or new infrastructure to support GP surgeries, school and local hospitals.

There are zone 2 and 3 flood risk areas within the Site Allocations Plan boundary, developing the entire site would vastly increase the flood risks not only within the area but the contiguous areas. Flood events will become more frequent as greenbelt is removed and run off from new properties increases.

Flood risk assessments must be carried out but there are other areas within WBC where flood risk is much lower and distributed over a wide area would be much more suitable for development.

New Zealand Golf Course has a unique environment and home to protected animals.

Replacing the mature trees and open heathland with concrete would irreversibly change the very character of the area.

The area itself is characterised in the name 'Woodham', by a mix of Woodland and Tree Lined roads.

House affordability crisis – Building on the Green Belt to meet housing shortage is only part of the problem and not the major contributor. The larger part of the housing affordability crisis is related to the demand side by low interest rates, government policies and incentives for Buy To Let, the banking system and the housing and mortgage market.

Population distribution and urban densities should be looked at compared to other cities. Vacant properties and brownfield sites could provide homes instead of building new ones.

A failure of Government to ensure a better dispersion of development has encouraged inward migration to the South East of England and increase demand for property in localised regions of the UK.

#### **Officer Response:**

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper. The Topic Paper also explains how brownfield sites have been prioritised for assessment (see Section 11).

The Council's response to urban sprawl and Fair Oaks, transport and traffic, infrastructure and funding, flooding, woodland and wildlife can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

The Council will work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council notes the reasons for the housing crisis as set out in the representation. It should be noted that these issues are outside the scope of the planning process and are closely linked to the wider UK economy and national policies set by central Government, such as buy-to-let policies. Nevertheless, the Strategic Housing Market Assessment (2015) (SHMA) clearly sets out the housing need in the Borough. This identified housing need has informed the Core Strategy and the Council is fully committed to its comprehensive delivery. The Site Allocations DPD is an important delivery mechanism that will help deliver the aims and objectives of the Core Strategy.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The

Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

As set out in the Core Strategy, in particular policy CS1: A spatial vision for Woking Borough; CS2: Woking Town Centre and CS3: West Byfleet District Centre; the Council will support high density development in the town and district centres as they offer good access to existing services and facilities. The Core Strategy also contains policies to ensure that development across the Borough reflects local character and is of an appropriate density. The Design SPD sets this out in greater detail, and new development should comply with these guidelines in order to be supported.

**Contributor Reference:** 02514/1/001  
**Customer Name:** Ms Fiona Ritchie

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

The largely derelict land which is east of Martyrs Lane and north of New Zealand Golf Course would be able to fully supply the 1024 houses

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Unlike the other site allocations, such as the two large fields either side of Upshot Lane at the top of the Pyrford Escarpment, the land to the east of Martyrs Lane does and has already had building development and non-agricultural usage.

Pyrford fields are used for farming

Developing the land to the east of Martyrs Lane will be recycling derelict land that is barely used

The land east of Martyrs Lane is not well-used amenity for all the people of the Borough.

The Pyrford escarpment fields, are very much a well-used amenity for all people from across the Borough

Unlike the Pyrford fields the land east of Martyrs Lane is not heritage land, and has never been deemed to be. This contrasts with all the highly regarded Conservation land immediately adjacent to Upshot Lane and its two large, open fields i.e. Pyrford Common, Pyrford Village Conservation, Pyrford Court and the Aviary Road Conservation Area.

The land east of Martyrs Lane is not rural green belt and therefore does not provide the open countryside and farmland between hamlets and villages that the Pyrford fields do i.e. between the ancient Norman church of St Nicholas and Church Farm leading up to Upshot Lane and the entrance into Pyrford Village.

The landscape of east of Martyrs Lane is not protected by Woking Core Strategy policy whereas under CS24 the Pyrford fields are already deemed important to protect as 'escarpment and rising ground of landscape importance'.

The A320 Chertsey Road and the nearby A245 Woodham Lane already provide the land east of Martyrs Lane with arterial road infrastructure, bus routes and easy access to the M25 and into

Woking Town Centre for the railway station and this can be expanded if needs be. This is not the case for the small, narrow lanes and roads leading up to the Pyrford fields.

Would provide one real, contained community of mixed housing, providing affordable housing, rented, shared ownership, help to buy and fully owned homes for the Borough.

New facilities could be built such as a much needed Doctor's surgery and a new Junior School to meet growing capacity would all help the Borough in the future rather than adding to already sorely overstretched amenities.

#### **Officer Response:**

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations

DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the

A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full

and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02555/1/001  
**Customer Name:** Mr Alistair Ritchie

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

The largely derelict land which is east of Martyrs Lane and north of New Zealand Golf Course would be able to fully supply the 1024 houses

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Unlike the other site allocations, such as the two large fields either side of Upshot Lane at the top of the Pyrford Escarpment, the lane to the east of Martyrs Lane does and has already had building development and non-agricultural usage.

Pyrford fields are used for farming

Developing the land to the east of Martyrs Lane will be recycling derelict land that is barely used

The land east of Martyrs Lane is not well-used amenity for all the people of the Borough.

The Pyrford escarpment fields, are very much a well-used amenity for all people from across the Borough

Unlike the Pyrford fields the land east of Martyrs Lane is not heritage land, and has never been deemed to be. This contrasts with all the highly regarded Conservation land immediately adjacent to Upshot Lane and its two large, open fields i.e. Pyrford Common, Pyrford Village Conservation, Pyrford Court and the Aviary Road Conservation Area.

The land east of Martyrs Lane is not rural green belt and therefore does not provide the open countryside and farmland between hamlets and villages that the Pyrford fields do i.e. between the ancient Norman church of St Nicholas and Church Farm leading up to Upshot Lane and the entrance into Pyrford Village.

The landscape of east of Martyrs Lane is not protected by Woking Core Strategy policy whereas under CS24 the Pyrford fields are already deemed important to protect as 'escarpment and rising ground of landscape importance'.

The A320 Chertsey Road and the nearby A245 Woodham Lane already provide the land east of Martyrs Lane with arterial road infrastructure, bus routes and easy access to the M25 and into

Woking Town Centre for the railway station and this can be expanded if needs be. This is not the case for the small, narrow lanes and roads leading up to the Pyrford fields.

Would provide one real, contained community of mixed housing, providing affordable housing, rented, shared ownership, help to buy and fully owned homes for the Borough.

New facilities could be built such as a much needed Doctor's surgery and a new Junior School to meet growing capacity would all help the Borough in the future rather than adding to already sorely overstretched amenities.

#### **Officer Response:**

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations

DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the

A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full

and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02589/1/001  
**Customer Name:** Mrs Rosemary Beynon

**Summary of representation:**

Objects to the proposal for the use of the land to the east of Martyrs Lane, instead of the draft sites in Byfleet, Mayford & Pyrford.

Proposed development in West Byfleet at Broadoaks, West Byfleet centre is to be redeveloped, and Sheerwater. All this house building needs proposals for more infrastructure.

Also nearby is the proposal to build houses on Fair Oaks airfield.

The impact on West Byfleet was not mentioned in your document, but would change it radically by all this development.

This would see a lot of the present open land around disappear with an almost continuous spread of houses. It will impact hugely on the infrastructure & the environment.

The roads are already congested along the Sheerwater Road & Woodham Lane

The loss of the green areas would affect the quality of the air.

**Officer Response:**

Objects to the proposal for the use of the land to the east of Martyrs Lane, instead of the draft sites in Byfleet, Mayford & Pyrford.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

**Contributor Reference:** 02592/1/001  
**Customer Name:** Mr Stuart Jarvis

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt. Strongly objects to any development on Greenbelt as it has detrimental environmental effects as well as on living standards wherever it occurs. The approach of Central Government to "unprotect" protected land is totally reprehensible and makes a mockery of planning and general laws in this country.

However, on balance, I am in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land

to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the

Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);

- o Cumulative assessment of future development impacts on the highway network (2011);
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It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02543/1/001  
**Customer Name:** Mr And Mrs David And Marianne Eliot

**Summary of representation:**

Although all the sites which are been discussed are in Greenbelt

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

A single site would be better for the cohesive planning of the infrastructure, sewage, water, schools, doctors, social housing.

The Northern part of the site already has good access to major roads and access to public transport. This would minimize the added congestion, which over 1000 new homes will unavoidably bring

The northern part of the site is council owned

The site is used for non-agricultural purposes

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

**Contributor Reference:** 02547/1/001  
**Customer Name:** Mr Tim Cockrill

**Summary of representation:**

Not totally opposed to the use of the Upshot Lane fields for housing development if the appropriate infrastructure is there to support the development. Understands and sympathise with the need to create more housing but this needs to take account of the infrastructure and respect the environment.

Our preference would be for the development of Martyrs Lane as a single site as we think this site could accommodate the requirements for affordable homes and the educational and health infrastructure to support the additional homes.

Ensure that the additional housing is appropriate not excessive and damaging to the green belt.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02551/1/001  
**Customer Name:** Ms Victoria Blissett

### **Summary of representation:**

Martyrs Lane site is a suitable substitution to Upshot Lane Pyrford

#### Previously Developed Site

Pyrford's unique semi rural setting is largely unspoilt with open views south and escarpment.

The two fields have been farmed and the distinctive character of the area highlighted in the Pyrford Neighbourhood Plan.

3 sites to the north of the golf course are almost unused, partly pre-developed and derelict. There is no landscape element, no known footpaths and the public seem not to use it.

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1024 Dwellings required not 900 to 3500.

#### Building on NZGC is Not Necessary

The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford on this criteria.

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The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character.

The Brett Report designated Martyrs Lane as having low capacity for change. The site has no local or national landscape designations.

Economies of Scale – One larger site of 1024 properties would provide economies of scale, making it easier to resolve infrastructure

Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by 6 separate sites.

Affordable homes – land values of northern sites are much less than the 6 original sites suggested and this facilitate the provision of Affordable Housing.

There are three large employers close by the Martyrs Lane site – McLaren, Animal & Plant Health Agency and St Peter's Hospital. The latter needs affordable housing for its employees who work shifts and bus 446 passes Martyrs Lane to the hospital.

The selection of Martyrs Lane would allow new and efficient infrastructure to be put in place

Also there would be less disruption to existing communities than with the original 6 sites.

Current proposals for West Byfleet area pre-2027 from Sheer House, Broadoaks and West Hall which will result in approximately 950 new homes.

Road Congestion – Summary information compiled from the Surrey County Council (SCC) traffic reports would have less impact on traffic conditions than the development proposed. These traffic studies suggest Martyrs Lane would alleviate the congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking.

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Currently, safeguarded sites in Pyrford & Byfleet are accessed by B or C roads. Traffic flow along the A245 through West Byfleet & over M25 bridge is close to theoretical maximum.

Traffic Access – The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to the A320.

Healthcare – The West Byfleet Health Centre is fully subscribed. With the potential number of new dwellings at Martyrs Lane, there would be an opportunity to build a new health centre and relieve current healthcare resources at West Byfleet facility.

Schooling – Pyrford CofE Primary School is already full and has taken many pupils from the Maybury area, Martyrs Lane site would be an ideal opportunity to build a new school as part of the development plan.

Public transport – Martyr's lane already has better bus services than other sites.

Amenity value – Green Belt land in Pyrford is very accessible and actively used. By contrast Martyrs Lane is not easily accessible and in comparison rarely used by the public despite it's Green Belt status.

Heritage – Aviary Road Conservation Area and the network of ancient footpaths. The two fields are integral to the heritage setting of the area.

Martyrs Lane has limited public footpaths through the area and has no known heritage value.

Well contained by Urban Boundaries to north and west and if northern 3 sites selected then golf course to south is thought to be good retainable green space. Entire 112 hectares provides a viable new Green Belt Boundary but there is no requirement to allocate all land for housing.

No local nor national landscape designation on the Martyrs Lane site.

No listed buildings on the 3 northern sites and there is no known heritage value to the land on Martyrs Lane to the north of NZGC.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of the 6 original sites safeguarded sites.

#### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

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They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that

the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response

to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

If the Council were to decide to safeguard this site or any of the other sites, its development will take into account any development proposals in the vicinity of the site.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

**Contributor Reference:** 02976/1/001  
**Customer Name:** Mr Jonathan Blissett

### Summary of representation:

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

#### Previously Developed Site

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The two fields have been farmed and the distinctive character of the area highlighted in the Pyrford Neighbourhood Plan.

3 sites to the north of the golf course are almost unused, partly pre-developed and derelict. There is no landscape element, no known footpaths and the public seem not to use it.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response

to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

If the Council were to decide to safeguard this site or any of the other sites, its development will take into account any development proposals in the vicinity of the site.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

**Contributor Reference:** 02558/1/001  
**Customer Name:** Ms Jane Messenger

**Summary of representation:**

The site is big enough to accommodate 1200 houses, including affordable housing, and the necessary infrastructure of shops, primary schools, health centre, etc., without encroaching on the golf course.

It is much easier to create the associated infrastructure rather than overloading existing facilities.

It will also simplify the process for obtaining planning permission.

There are major employers close by: St Peter's Hospital, the Animal and Plant Health Agency, and McLaren Technology Centre.

The A320 gives easy access to the M25 and Heathrow Airport to the north, and to Woking town centre and the mainline railway station to the south without encountering the traffic delays where roads cross railway lines. Bus routes and cycle routes, including to Woking town centre, exist already.

There is little development along the A320 north of Woking, making road widening relatively easy if necessary.

Although in the green belt, the site has no other national or local landscape designation unlike some of the other proposals.

North of the golf course the land is largely disused and derelict and planning permission has previously been given

it should be possible to build all the properties necessary, even if it subsequently turns out that more than 1200 are needed, or if there is a further requirement post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02565/1/001

**Customer Name:** Jo Caruth

### **Summary of representation:**

Difficult consultation as all sites are within the Green Belt but, on balance, I am in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford on this criteria.

The Brett report also considered Pyrford land to be in category Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The parcel is identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford fields.

In addition, the Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. This is supported by The Surrey Landscape Character Assessment and Pyrford Neighbourhood Plan.

The Brett Report designated Martyrs Lane as having low capacity for change. The site has no local or national landscape designations. The site has been partially developed in the past and has included both military and civilian dwellings

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall

total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport

Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the

references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02562/2/001  
**Customer Name:** Ms Lynne Mullin

**Summary of representation:**

Objects to the proposed development of the area including Martyrs Lane and New Zealand golf course.

Objects to the compulsory purchase of Green Belt land.

Increasing urbanisation and population density in a area that is saturated, particularly with the other new developments, Longcross already in progress and the proposed site of Fair Oaks.

The public services such as schools, medical facilities and roads are struggling to cope now without another minimum of 3500 homes in the area.

The quality of life for people living in the Woking Borough Council area will become very unpleasant.

I accept that new homes are needed. However this objection is not a case on 'not in my back yard' but more of a case of far too much in one place, in an area that is already struggling to cope and taking valuable green belt away.

**Officer Response:**

Objection to the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to

enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in

Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02584/1/001  
**Customer Name:** Mr Chris Goddard

### **Summary of representation:**

The representation considers that development of the land to the east of Martyrs Lane would have a detrimental impact on the quality of life for existing residents of Woking.

Increased traffic (private car usage). The site is isolated geographically and development of the site would result in significantly increased levels of private car usage. The vast majority of journeys to work, schools, shops, doctors, rail stations etc will surely need to be made by car.

This is not sustainable and will increase CO2 emissions as well as other air pollutants in the borough. The adjacent Woodham Lane (A245) and A320 are already congested

Biodiversity will be reduced in the borough by the eradication of habitat. The site is surely a priceless corridor for animal species, linking Horsell Common and tributaries to The Bourne river.

Urban sprawl. The areas of West Byfleet/Byfleet/Brooklands/New Haw/Addlestone/Weybridge are increasingly merging into a concrete jungle.

### **Officer Response:**

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various

development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites. In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

A key thrust of the transport policies of the Core Strategy and the NPPF are to influence a shift from car based travel to sustainable travel modes such as public transport, walking and cycling.

The overall spatial strategy of the Core Strategy is to concentrate most new development at the main centres because they offer a range of key services and facilities to help minimise the need to travel and to encourage sustainable travel modes. Specific references are made to Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. These policies have been scrutinised at Examination and

judged to be in conformity with the NPPF. In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality. Policy CS18 of the Core Strategy makes this point very clear.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- Woking Green Belt review (2013) by Peter Brett Associates; and
- Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

**Contributor Reference:** 02586/1/001

**Customer Name:** Chris Garratt

**Summary of representation:**

Objects to the proposal to develop housing on the Upshot Lane Fields and supports the Martyrs Lane site.

The Martyrs Lane land has previously been developed

Existing transport links, compared with Pyrford where transport is already stretched, and it is a more rural area having been used for agriculture for decades and in the Green Belt.

Economies of scale of one site

The Pyrford area infrastructure is also already stretched and the School over subscribed whereas the Martyrs Lane land will provide ample space to more efficiently locate a new school and health centre as well as the necessary supporting infrastructure.

**Officer Response:**

Objects to the proposal to develop housing on the Upshot Lane Fields and supports the Martyrs Lane site.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02950/1/001

**Customer Name:** Uche Achebe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02951/1/001  
**Customer Name:** Ms Caroline Coulthard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02513/1/001  
**Customer Name:** Ms Lisa Bobrowski

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02515/1/001  
**Customer Name:** Ms Kathryn Cliffe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02633/1/001  
**Customer Name:** Mr And Mrs L Pullen

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02627/1/001  
**Customer Name:** Mr Andrew Grimshaw

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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- o Cumulative assessment of future development impacts on the highway network (2011);
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**Contributor Reference:** 02610/1/001

**Customer Name:** R Bagley

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

Fewer residents will be disrupted by one site than by six individual sites.

Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

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The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02606/1/001  
**Customer Name:** Mrs Barbara Roddy

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

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relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02607/1/001

**Customer Name:** Mr S Bonito

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

Fewer residents will be disrupted by one site then by six individual sites.

Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

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**Contributor Reference:** 02603/1/001

**Customer Name:** Mr R Jupp

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

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Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

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**Contributor Reference:** 02598/1/001  
**Customer Name:** Mr Bernard Blake

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

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Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02594/1/001  
**Customer Name:** Mr Terence O'Keeffe

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

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**Contributor Reference:** 02593/1/001

**Customer Name:** Mr J Bailey

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

Fewer residents will be disrupted by one site than by six individual sites.

Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

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to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02590/1/001  
**Customer Name:** Ms Susan Martin

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site than by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

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Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02588/1/001  
**Customer Name:** Mrs Jean Smith

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

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The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02583/1/001  
**Customer Name:** Mr Peter Howden

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

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The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site

Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02604/1/001  
**Customer Name:** Mr Michael Keen

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site. There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

Over the last thirty years, the congestion in the area has become worse and worse. Traffic will be considerably worsened by this development and there is land, not green belt, elsewhere in the country that should be used, rather than keep building here.

Some of the green belt in Pyrford and Woking is near sites of historic interest or historic woodland and as has been the case in the past, building should not be allowed near these sites.

Finally, to reiterate, is in favour of substituting one safeguarded site for the six currently identified safeguarded sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding, including those sites in Pyrford, will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development. This assessment would take historic traffic trends into account, in forecasting future traffic impacts.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is

submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst the landscape and amenity features of the sites in Pyrford are highly valued, as set out in the representation, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy, the Development Management Policies DPD and the Pyrford Neighbourhood Plan include robust policies to protect heritage and local landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise these assets. This includes design policies, which ensure any new developments are designed and masterplanned in such a way that maintain the character of the area in which they are situated.

**Contributor Reference:** 02635/1/001  
**Customer Name:** Mr Ronald Colvin

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

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The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02634/1/001

**Customer Name:** Ms J Mulvany

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

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The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

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**Contributor Reference:** 02640/1/001  
**Customer Name:** Mr Michael Mulvany

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

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County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02638/1/001  
**Customer Name:** Ms Jean Boffee

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

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The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02572/1/001

**Customer Name:** Mrs E C Jones

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt, but support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site includes previously developed land and is now semi-derelict.

The northern site is publicly owned land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other

constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02587/1/001  
**Customer Name:** Mr P T Harvey

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Councils to provide this. The Martyrs Lane site has the least favourable impact on the local community.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Positive aspects of Martyrs Lane site include:

One self-contained site can provide sufficient homes, including affordable and social housing, to meet Government requirements;

Economies of scale and less disruption in providing required utilities;

Large enough to enable infrastructure needs to be met e.g. a school and medical facilities;

Least impact on road congestion and traffic flow – close to A320 and easy access to Town Centre, Chertsey and M25;

Well served by public transport;

Publicly owned land thus reducing cost to the Borough and citizens;

Includes previously developed land.

Negative aspects of original sites:

Disruption to public;

Inadequate infrastructure provision in six small, disparate sites;

destruction of agricultural land;

Increased traffic flow on Old Woking Road and Parvis Road, in addition to that from West Hall and Broadoaks;

Lack of affordable and social housing provision.

**Officer Response:**

Supports the Martyrs Lane proposal excluding the New Zealand Golf Course is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of at least 1,024 new homes (the Council has identified the site to meet the minimum need of 1,200 homes). Cumulatively it is also true that the original six sites could deliver a similar amount of new homes, and meet Government requirements. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future

development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council continues to work with infrastructure providers, such as Surrey County Council as education and highways authority, to assess capacity of existing infrastructure, and provide new facilities where needed, as well as identify sources of funding.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts, including taking into account those impacts from current development proposals such as Broadoaks and West Hall. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the

Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst it is acknowledged that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

**Contributor Reference:** 02632/1/001  
**Customer Name:** Ms Genevieve Thompson

**Summary of representation:**

Supports the proposal.

All housing and infrastructure can be contained on one site, with enough room for 1,200 houses (including affordable housing, and housing which provides for all sectors of the local population), shops, school and health centre.

Good transport and road links e.g. bus routes, A320 and nearby M25.

Presumption for development as part has been given planning permission and there are no national or local landscape designations.

Nearby to major employers.

Would provide for Woking's future Traveller needs.

**Officer Response:**

Support is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Whilst there are good links to main roads, there are likely to be traffic impacts. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation highlights the availability of bus routes. However, public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Regarding the representation on landscape designations, should the original sites be safeguarded, development proposals will be expected to take into account landscape designations in their designs. The Council is confident that the overall integrity and purpose of the Green Belt would be retained. The Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the constraints of the sites. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of

Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. Policies in the Development Plan for the area would ensure that a suitable housing mix is provided at any of the sites under consideration, which will meet the housing needs of the area. In these particular regards, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

**Contributor Reference:** 02575/1/001  
**Customer Name:** Ms Diane Wiltshire

**Summary of representation:**

Supports the proposal, in favour of Pyrford fields.

The fields command a lovely view, is good agricultural land for growing crops in the future, and retain a sense of open space and rural aspects for the community. This Green Belt land – in an area of beauty – must be preserved. Development here would lead to congestion on country roads and result in costly road improvements. Instead, the fields should be designated as open spaces for Pyrford children to play in, or people to walk in.

One site is preferable to six sites. The site is already used for McLarens' huge complex and a previously developed army camp, so it has already lost its Green Belt status in essence.

It is large enough to accommodate 1200 houses, even if it needs draining in part.

It has good access to main roads leading to Town Centre and M25.

The utilities have been laid.

It would upset fewer residents and provide much needed homes in a pleasant area.

**Officer Response:**

Support is noted.

Regarding the representation on the landscape qualities of the Pyrford sites, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation regarding the Pyrford sites are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close

to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst Officers accept that the landscape and amenity features of the sites in Pyrford are highly valued, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy, the Development Management Policies DPD and the Pyrford Neighbourhood Plan include robust policies to protect heritage and local landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise these assets. This includes design policies, which ensure any new developments are designed and masterplanned in such a way that maintain the character of the area in which they are situated. Development at the Pyrford sites could potentially bring with it opportunities to provide new infrastructure such as play areas for children or improved walking routes.

It should also be noted that as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings (but not the McLaren buildings – these are outside the site area). These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The opinion in the representation regarding Green Belt

status of the land is noted; nevertheless, the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The accessibility of the site to main roads is noted, however, the traffic impacts of such a proposal would need to be considered. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the proposal regarding infrastructure provision, such as utilities, are noted and will weigh in the balance of considerations by Members. To ensure sustainable development,

the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. Section 3 of the Regulation 18 consultation Issues and Matters Topic Paper explains how adequate infrastructure would be provided to support developing on the originally proposed sites, including transport infrastructure.

**Contributor Reference:** 02573/1/001  
**Customer Name:** Mr Alan Wiltshire

**Summary of representation:**

Supports the proposal, in favour of Pyrford fields.

The fields command a lovely view, are good agricultural land for growing crops in the future, and retain a sense of open space and rural aspects for the community. This Green Belt land – in an area of beauty – must be preserved. Development here would lead to congestion on country roads and result in costly road improvements. Instead, the fields should be designated as open spaces for Pyrford children to play in, or people to walk in.

One site is preferable to six sites. The site is already used for McLarens' huge complex and a previously developed army camp, so it has already lost its Green Belt status in essence.

It is large enough to accommodate 1200 houses, even if it needs draining in part.

It has good access to main roads leading to Town Centre and M25.

The utilities have been laid.

It would upset fewer residents and provide much needed homes in a pleasant area.

**Officer Response:**

Support is noted.

Regarding the representation on the landscape qualities of the Pyrford sites, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation regarding the Pyrford sites are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close

to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst Officers accept that the landscape and amenity features of the sites in Pyrford are highly valued, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy, the Development Management Policies DPD and the Pyrford Neighbourhood Plan include robust policies to protect heritage and local landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise these assets. This includes design policies, which ensure any new developments are designed and masterplanned in such a way that maintain the character of the area in which they are situated. Development at the Pyrford sites could potentially bring with it opportunities to provide new infrastructure such as play areas for children or improved walking routes.

It should also be noted that as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings (but not McLaren's buildings – this is outside of the site area). These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The opinion in the representation regarding Green Belt status of

the land is noted; nevertheless, the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The accessibility of the site to main roads is noted, however, the traffic impacts of such a proposal would need to be considered. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the proposal regarding infrastructure provision, such as utilities, are noted and will weigh in the balance of considerations by Members. To ensure sustainable development,

the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. Section 3 of the Regulation 18 consultation Issues and Matters Topic Paper explains how adequate infrastructure would be provided to support developing on the originally proposed sites, including transport infrastructure.

**Contributor Reference:** 02628/1/001  
**Customer Name:** Ms Carol Morton

**Summary of representation:**

Development in Pyrford will increase air pollution including that from traffic. Traffic has already reached capacity in the area.

Breathing is a problem.

The Pyrford sites produce food and this should be considered.

Wildlife is important.

**Officer Response:**

Objection to development in Pyrford is noted.

The social and environmental implications of development, regardless of whether it is in Pyrford or elsewhere in the borough, will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are

classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

During the preparation of the Site Allocations DPD the Council consulted with Natural England on the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Natural England based on existing biodiversity features that could not be addressed.

Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess and address any site specific ecological issues. This will help determine how development is managed on the site.

The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

**Contributor Reference:** 02605/1/001  
**Customer Name:** Sport England

### **Summary of representation:**

Sports England seeks to protect against the loss of sports facilities including playing pitches unless exceptional circumstances as set out in paragraph 74 of the NPPF apply. The land east of Martyrs Lane is used for sports, including the New Zealand Golf Course and the sports facilities at Woodham Sports Club. The proposed safeguarding of the site would lead to the loss of the existing sports facilities on the site. One of the criteria to meet to justify the loss of a facility is 'a carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sports England that there is an excess of playing field provision in the catchment and the site has no special significance to the interests of sports. Sports England is aware of the Council's Playing Pitch Strategy. The strategy does not identify the Woodham Sports Club as part of the strategy to meet current and future needs because it is disused. Sports England is still likely to object to any proposals which would lead to the loss of disused playing field unless any of the exceptions would apply. Sports England has consulted England Golf (the national government body) on the proposed loss of the Golf Course. England Golf has confirmed that the Golf Course is home to the New Zealand Golf Club and New Zealand Artisans Golf Club. England Golf has undertaken an analysis of the catchment area for golf within Woking Borough and considers that the demand for golf in the area exceeds the average demand for golf within the South East region across all its 9 user/player groups and provides a mixed offer for different categories of golfer from the formal offer of traditionalists through to the informal offer for more casual players. No robust assessment has been done by the Council to demonstrate that the golf course is surplus to requirements as required by the NPPF. On the basis of the above, Sports England objects to the proposal to safeguard the land east of Martyrs Lane for future development.

### **Officer Response:**

The Council fully appreciates the need to meet the requirements of paragraph 74 of the NPPF, in particular, the need to protect existing open space, sports and recreational buildings and land unless an assessment has been undertaken which has clearly shown the open space, buildings or land is surplus to requirement. The Council has its own locally specific policy which establishes the importance of sports facilities to the wellbeing of the community and the need for their protection and provision where needed. Policy CS17: Open space, green infrastructure, sports and recreation of the Core Strategy establishes a presumption against any development that would involve the loss of a sport, recreation or play facility except where it can be demonstrated that there is excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development.

The Council has recently adopted its Playing Pitch and Outdoor Sports Facilities Strategy (April 2017). The Woodham Sports Club is not identified to meet current or future needs of the area. The strategy demonstrates that there is no evidence of demand for additional outdoor courts. Latent demand exists, but this demand could be met by protecting and enhancing existing

provision. In making this recommendation, the strategy had taken into account that the disused Woodham Sports Club will not be enhanced or redeveloped to contribute towards meeting the future needs. In accordance with the strategy, the Woodham Sports Club would be surplus to requirement. The landowner has confirmed her support for the land to be used to meet future housing needs, and is promoting the land as such. There is no expectation at this stage that the facilities will be restored to a useable state. Based on the above there is sufficient evidence to justify its alternative use. It will be unreasonable in this circumstance to retain a disused facility with no prospect for its restoration when the Playing Pitch Strategy does not expect it to make any contribution towards future need. Its retention will be contrary to the efficient use of land. It is important to stress that Policy CS17 requires all development to contribute towards the provision of outdoor sports facilities. If the land is safeguarded appropriate contribution will be sought towards enhanced outdoor sports facilities. The Council's Regulation 123 List makes open space and recreational facilities a priority to benefit from CIL funding. This can be planned as an integral part of the proposed development on site or contributions could be made to provide alternative facilities at a location that is accessible to users or to enhance existing facilities where maximum benefits could be achieved.

The Council has not carried out any bespoke study to assess the demand for golf in the area. Similarly, the Playing Pitch Strategy does not include any information on demand for golf. Without this evidence, it would be difficult to predict with confidence that the New Zealand Golf Course is surplus to requirement. Based on local knowledge, the Council is aware that this particular Golf Club is operational and heavily subscribed. In this regard, the requirements of Policy CS17 would apply if the site has to be safeguarded for an alternative use. The owners of the New Zealand Gold Club have confirmed that the club is heavily subscribed and has been thriving for over 120 years. Based on local knowledge, there is no reason to doubt that. Sports England's research demonstrates that there is demand for golf in the area and the demand exceeds the general demand in the South East Region. Whilst the Council accepts the analysis by Sports England about the demand for golf in the area, it would also have been helpful if the analysis emphasised whether the supply of golf facilities are sufficient to meet the demand. For the size and population of Woking Borough, there are presently 11 good sized golf courses in the area. From the available information, it is clear that the proposal would lead to the loss of an existing operational sports facility with a history to protect when there is a presumption against the loss of such facilities. This is a key consideration to inform the decisions of the Council.

The overall goal for the Site Allocations DPD is to contribute towards achieving sustainable development. In this context, the Council will have to decide whether there are overriding benefits for the common good of the community to safeguard this particular land for future development needs which will far outweigh the benefits for retaining the facility at this particular location, recognising that the land will not be available and the Council might have to use its compulsory purchase powers to acquire it.

**Contributor Reference:** 02629/1/001

**Customer Name:** A J Pratt

### **Summary of representation:**

Woking Borough Council has been very protective of the Green Belt. It is important as it defines the urban area and stops further development and expansion.

Development has been proposed on the Green Belt in Pyrford before and resisted by residents and the Council. There is great local opposition to develop this fields. They form part of the southern boundary and should stay as Green Belt. The infrastructure in the area is at capacity such as water, sewage, gas. The road network is also at capacity and results in congestion. Development in Byfleet or Pyrford would have local impacts on the road network.

The Martyrs Lane site is on the A320 to Woking, Addlestone, Chertsey and the M25. These towns also have railway stations.

The A320 has all the main services in it.

Part of the site has been previously developed and granted planning permission for a technology centre.

Part of the site is also publicly owned land and much of it has been used for non-agricultural purposes.

There is no public access to the land.

A single site would provide some economies of scale to deal with the infrastructure issues.

A number of bus routes use the A320 to Woking and connects the site to major local employers.

Fewer residents will be impacted than six individual sites.

The New Zealand Golf Course should not be included in the development and kept as green space.

Support the Martyrs Lane proposal.

### **Officer Response:**

As set out in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Sections 1.0 and 2.0, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. Overall the Council is seeking to remove around 3.5% of the Green Belt to meet development needs up to 2040. By removing this amount of land from the Green Belt, the Council is seeking to protect the overall purpose and integrity of the borough's Green Belt.

Objection to development proposals in Pyrford are noted.

Regarding the representation on urban boundaries, the Green Belt boundary review report provides sufficient evidence that the release of the proposed allocated sites from the Green Belt will enable a defensible boundary to be drawn that will ensure over a long period of time

beyond the Core Strategy period. Where the recommendations of the report had not been accepted by the Council, a clear reason has been given in the draft Site Allocations DPD. The proposed safeguarded sites in Pyrford would be defined by Pyrford Common Road and Church Hill to the south and the public footpath to the east of the site known as GB13.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. The Council has also consulted with the relevant utility providers to ensure that there is no adverse impact on utility provision as a result of development.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding traffic and congestion in Pyrford has been addressed in paragraph 3.6 of the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding the road infrastructure merits of the Martyrs Lane site, as set out in the representation, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios,

including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties.

Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that much of the site has already been used for non-agricultural uses, this can also be said for the majority of the original six sites. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport

Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst the representation states that the New Zealand Golf Course should not be developed, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Support for the Martyrs Lane proposal is noted.

**Contributor Reference:** 02602/1/001  
**Customer Name:** Miss S M Argent

**Summary of representation:**

Wrote previously that the two sites on Upshot Lane should be protected from development. They are cherished by local residents and visitors. The narrow roads in the area and overstretched facilities such as the school and parking would make this proposal impractical.

Supports the proposal for Martyrs Lane excluding the New Zealand Golf Course.

The top part of the site was granted planning permission for a technology centre and also includes previously developed land which is now semi-derelict.

The top part of the site is partly publicly owned so will help council tax payers.

Much of the top part of the site has been used for non-agricultural purposes.

A single site would offer economies of scale to deal with infrastructure issues including affordable housing.

The northern part of the site is well served by public transport unlike the other sites.

The site has access to the A320 with links to the M25 and Woking town centre.

The site is close to major employers.

Fewer residents will be impacted by one site than the six individual sites.

**Officer Response:**

Objection to development proposals in Pyrford and support for the Martyrs Lane site is noted.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The representation regarding infrastructure has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In particular Section 3.0.

Whilst the representation states that the New Zealand Golf Course should not be included in the site area, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that much of the site has been used for non-agricultural uses, this can also be said for the majority of the original six safeguarded sites. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the

development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02596/1/001

**Customer Name:** P L Serwent

**Summary of representation:**

Objects to development proposals in Pyrford and supports the Martyrs Lane proposal.

Development in Pyrford would take place on more than one site, resulting in disruption to several residential areas and delays on adjacent roads. Martyrs Lane would involve far less disruption.

The construction of buildings on split sites would increase the cost of any proposed development.

Access to Martyrs Lane is easier compared with the sites in Pyrford, taking into account nearby residential areas and pressing local infrastructure issues such as education and healthcare provision.

**Officer Response:**

Objection to development in Pyrford and support for the Martyrs Lane proposal is noted.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there could be some financial benefit to developing one site rather than individual sites, the overriding consideration for this particular consultation is to ensure that the most sustainable sites are identified and that any land removed from the Green Belt will not undermine its overall purpose and integrity.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 00612/2/001  
**Customer Name:** Mr Maurice Rubin

**Summary of representation:**

Concerned about removing the Green Belt status of the site. Green belt is precious and prevents unrestricted urban sprawl.

Development could also have an adverse impact on rare species of birds, namely the Dartford Warbler, Nightjar and Woodlark, together with other wildlife. The ancient woodlands on the site should be protected.

Previously Woking Council has been very supportive of the SPA and are at a loss to understand this change in approach. The Council should be lauding the importance of nature conservation.

The success of Heather Farm indicates a demand for open spaces for the residents of Woking. More housing will place additional pressure on an area which is the most frequently visited sites across the entire TBH SPA.

The Martyrs Lane site includes a substantial and strategic area of Common Land owned by Horsell Common Preservation Society.

The infrastructure in the area is insufficient to cope with the proposed development. Even if infrastructure were to be provided on site, the road network would be unable to cope. The Six Crossroads roundabout and A320 are already identified as congestion blackspots.

The purchase of the New Zealand Golf Course either on a compulsory or voluntary basis would increase the level of debt on the Council to an unsustainable level to the detriment of all local council tax payers.

**Officer Response:**

The representations regarding urban sprawl and the purposes of Green Belt, wildlife, ancient woodland, infrastructure provision and the impact on the road network have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

Regarding the land ownership of the site, the Council has prepared a land ownership map of the land east of Martyrs Lane and is aware of the part of the land in the ownership of HCPS. It is not intended that this part of the site will be developed. It is included to ensure the defensible boundary of the Green Belt. To put it into context, the land in the ownership of HCPS is about 1.42 hectares (approximately 1.3% of the entire land). Most of the land is either Common Land, in Flood Zones 2 and 3 or within the SPA. The consultation document makes it clear that these areas will not form part of the developable area and therefore this will not compromise the delivery of the site to meet the Council's overall objectives.

The representation regarding the purchase of the New Zealand Golf Course is noted and will be one of the factors that has to weigh in the balance when the Council makes its decision on the matter.

The Council is aware of the close proximity of the site to Heather Farm and Horsell Common SPA. Natural England submitted representation in response to the consultation. It does not have any objection in principle to the safeguarding of the site and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed.

**Contributor Reference:** 02625/1/001  
**Customer Name:** Mayford Village Society

**Summary of representation:**

There are sufficient brownfield sites to meet the future housing needs without using Green Belt Land.

Support the Martyrs Lane proposal

The site is big enough to accommodate including affordable housing, Gypsy and Travellers sites, and the necessary infrastructure of shops, primary schools, health centre, etc. It is much easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

One larger site will simplify the process for obtaining planning permission.

It is close to major employers

access to the A320 onto the M25, airport and Woking Town Centre.

The site is well served by public transport

Although in the green belt, the site has no other national or local landscape designation unlike some of the other proposals.

Site is clear of Flood Zone 2 and Flood Zone 3 which makes the process easier

Planning Permission was previously given therefore presume the land is suitable for development

Can reach target for Affordable housing and Specialist Residential accommodation

Provide Gypsy and Travellers pitches to the East of Woking, would provide access to employment, schools, health services and shops. Would satisfy the Council's Core Strategy (2012), CS14. Could place 15 pitches and remove GB7.

The size of the site can satisfy housing post 2040

The redevelopment of Sheerwater can be taken into account

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);

- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. The land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. By releasing Green Belt land for future development, the Council also has to make sure that there is a strong defensible Green Belt boundary. The areas of the land covered by Flood Zones 2 and 3 are included within the safeguarded designation to make sure that there is a strong defensible Green Belt boundary. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02600/1/001

**Customer Name:** Ms Ann Noel

### **Summary of representation:**

Support for the Martyrs Lane proposal.

National policy states that brownfield and previously developed sites should be used first. Pyrford sites have been used for agriculture and are high quality agricultural land. They also form an essential part of Pyrford's environment.

Martyrs Lane was granted planning permission for a factory which is now no longer required. The site was also used for development and the area north of the New Zealand Golf Course consists of derelict buildings and uncared for woodland.

Part of the site is publically owned land so a sale would help Council tax payers.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required plus any infrastructure requirements.

Only one local improvement will be required in infrastructure.

The Pyrford sites have less justification for removal from the Green Belt than the Martyrs Lane site. They are agricultural land, part of the local rural character and are of benefit to the whole of Woking. Martyrs Lane is previously developed, unimportant and has no public access.

Pyrford houses would command a higher price and Martyrs Lane would enable the provision of low cost housing and benefit from being in close proximity to local employers.

Martyrs Lane is adjacent to a major road and roundabout. The utility services could be provided efficiently. The A320 would be able to cope with additional traffic than the roads in the east and south of the borough. The road also provides access to the M25, Woking and neighbouring towns.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

There are a number of walking and cycling routes in Pyrford unlike the Martyrs Lane site.

Significant development in West Byfleet, Pyrford and Mayford would change the nature of those areas whereas the Martyrs Lane site is well screened and development could be accommodated behind that screening.

Support the Martyrs Lane proposal as it will have the least impact on the borough and minimise disruption.

Surprised that this was not originally put forward as it has more benefits than the six original sites from a financial, disruption and aesthetic point of view.

### **Officer Response:**

Support for the Martyrs Lane proposal is noted.

As set out in the Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land for development, including safeguarding

land for future development needs, has been established in the Core Strategy and is consistent with National Planning Policy. In addition, it should be noted that the Site Allocations DPD contains over 50 sites within the existing urban areas of the borough. The Site Allocations DPD as well as the Core Strategy clearly state that land will only be released from the Green Belt for development from 2022 when it is anticipated that there will be insufficient brownfield land to meet housing needs. Overall the Council has considered and assessed about 125 sites across the Borough in preparing its Site Allocations DPD.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting

their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport

Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

As set out above, the Council has undertaken a number of landscape studies to determine the visual impact of development of all of the various Green Belt options and will be one of the key considerations that will inform the Council's decision on its preferred safeguarding option.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

**Contributor Reference:** 02623/1/001

**Customer Name:** J L Wright

**Summary of representation:**

I am not in favour of these proposals due to road access.

Martyrs Lane has good access to the six cross roundabout, McLaren's roundabout, A320 and M25.

Upshot Lane access is via country lanes.

To exchange the six sites for one major site on unused land

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02622/1/001  
**Customer Name:** Mr And Mrs R I Hamilton

**Summary of representation:**

Objects to building on Pyrford fields and supports Martyrs Lane site.

Pyrford suffers from traffic and parking issues

**Officer Response:**

Support for Martyrs Lane site noted.

The Council has Parking Standards which will be adhered to during the Development Management stage, this is the same for this site or any of the six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The matters regarding the impact of development in Pyrford, in particular road infrastructure, has been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

**Contributor Reference:** 02620/1/001  
**Customer Name:** Mrs Patricia Taylor

**Summary of representation:**

Objects to development in Pyrford due to the narrow roads, flooding of the roads and car parks at capacity. Any development will exacerbate this.

Supports Martyrs Lane development as it is a large area, which could design traffic flow and have infrastructure of a school, health centre and recreation area.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Pyrford site is not within a flood zone. The Council has Parking Standards which will be adhered to during the Development Management stage, this is the same for this site or any of the six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02630/1/001

**Customer Name:** Mrs J Cooper

**Summary of representation:**

Support Martyrs lane site as a single site excluding building houses on the New Zealand Golf Course.

It causes a great strain on all the community services.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02576/1/001  
**Customer Name:** Mr Ian Whittle

**Summary of representation:**

The representation does not agree that Green Belt land should be used for development.

Support the Martyrs Lane proposal

Planning permission was recently granted

Derelict building on site

Parts of the site has publicly owned land

non-agricultural land

There is currently no public right of way

The site is served by public transport

The road system has the potential to be improved

New housing in this area will have less impact than elsewhere

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding less impact to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02609/1/001  
**Customer Name:** Ms Rosemary Kirby

**Summary of representation:**

Support the Martyrs Lane proposal

Planning permission was recently granted for the top part of the site.

Previously developed land

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues

The site is well served by public transport unlike the other sites.

access to the A320, the M25 and hospital

fewer residents will be disrupted by one site then by six individual sites

In contrast Pyrford fields are unique and have a semi rural setting, part of the escarpment, are farmed and the distinct character highlighted in the Pyrford Neighbourhood Plan.

The Pyrford schools are over subscribed

The adjacent roads are very busy

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site

Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
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- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated.

**Contributor Reference:** 02608/1/001

**Customer Name:** B J Kirby

**Summary of representation:**

Support the Martyrs Lane proposal

Planning permission was recently granted for the top part of the site.

Previously developed land

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues

The site is well served by public transport unlike the other sites.

access to the A320, the M25 and hospital

fewer residents will be disrupted by one site then by six individual sites

In contrast Pyrford fields are unique and have a semi rural setting, part of the escarpment, are farmed and the distinct character highlighted in the Pyrford Neighbourhood Plan.

The Pyrford schools are over subscribed

The adjacent roads are very busy

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

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Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated.

**Contributor Reference:** 02650/1/001  
**Customer Name:** Mr Stephen J Barney

**Summary of representation:**

Objects to building on the Green Belt, the Pyrford fields are valuable.

The Martyrs Lane site is limited in size and is placed in a good location.

The current resources are stretched, the site could offer a new bigger health centre, first school and affordable housing.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02591/1/001  
**Customer Name:** Ms Hazel Ingate

**Summary of representation:**

Objects to building on Pyrford fields. The schools and Doctors are at capacity and the local Chemist has been closed down.

New houses and families will make things worse.

People on Lovelace Drive are worried their houses will be devalued.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined. Therefore, although property values are not a material planning consideration, based on the above the Council is satisfied that if developed it will not have a negative impact on the area.

**Contributor Reference:** 02595/1/001  
**Customer Name:** Mr Christopher Punch

**Summary of representation:**

The principle that the green belt boundary should not be built on will be breached, so on that basis the representation is not for or against the proposal. However, if development on the green belt is inevitable, the representation agrees with the reasons given by the LDF Working Group as to why substitution should occur.

A dispersed strategy is not a sustainable pattern of development compared with a single site.

There is no local or national landscape designation on the proposed site in contrast with some of the other potential development sites.

A sensible road transport plan to support development at the proposed site is easily achievable, widening the A320 between Woking town centre and the M25, and there is an existing cycle connection to Woking. Provision of usable and frequent public transport would be very simple and should be cost-effective.

There are a number of potential large employers in that area and a presumption of staff accommodation

The proposed site has enough space to accommodate modern infrastructure such as schools, medical facilities, convenience stores, etc on site to minimise vehicle use, unlike other sites under consideration.

The site can easily be screened or landscaped to be almost invisible to existing neighbourhoods to the south and southeast – this does not apply to the other potential sites.

Both Woking and West Byfleet mainline stations could be accessed by public transport, cycle and on foot (W Byfleet only). The proposed site does not suffer from being south of the railway line.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a

single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The site could be screened or landscaped to make it less visually intrusive, however, this would be true of the other six sites. The Council will make it an essential requirement for the site to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine valuable landscape features. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

**Contributor Reference:** 02597/1/001  
**Customer Name:** Ms Bryony Davis

**Summary of representation:**

Concerned about any development that impinges on Greenbelt land and is close to the SSI of Horsell Common.

The A320 and surrounding roads are already overly busy and the impact of an increase in traffic.

Infrastructure in terms of schools, GP provision etc and infilling between Ottershaw and Woking.

**Officer Response:**

Objection to the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

**Contributor Reference:** 02601/1/001  
**Customer Name:** Ms Cathy Jarvis

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt. Strongly objects to any development on Greenbelt as it has detrimental environmental effects as well as on living standards wherever it occurs.

However, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for

safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the

safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and

jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02616/1/001  
**Customer Name:** Muireann Snow

**Summary of representation:**

Does not agree to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

Green belt – loss of green belt.

Urban sprawl and Fair Oaks development plans.

Flood risks – due to more covered area and loss of trees.

Transport – roads – pressure on existing roads, especially A320.

Transport – public – lack of public transport.

Infrastructure – huge stress on existing services and with no plan to build more schools and hospitals in the area.

Wildlife – loss of habitat.

Woodlands – loss of trees and woodland.

Flight path – development is in the flight path.

Martyrs Lane recycling centre – located right in the middle of the proposed development.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02621/1/001  
**Customer Name:** Ms Catherine Rendall

**Summary of representation:**

Objects to building on green belt land either side of Upshot Lane, Pyrford.

Detrimental to the environment – many trees will be felled and hedgerows lost to make way for "affordable" properties that only the wealthy will be able to purchase.

Pyrford's roads and amenities are already overstretched

Appreciate we need more housing, but the impact and appearance of the proposed redevelopment of West Byfleet

Surrey wildlife needs to be taken into consideration

**Officer Response:**

Objection to building on green belt land either side of Upshot Lane, Pyrford is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

The Council will make it an essential requirement for the site to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);

- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site, including the proposals at West Byfleet.

**Contributor Reference:** 02977/1/001

**Customer Name:** Sue Goddard

**Summary of representation:**

Woodham Lane currently forms a definite boundary to the northern limit of Woking and the land north of here should remain Green Belt.

**Officer Response:**

Objection to the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst Woodham Lane forms a defensible Green Belt boundary, if the Council were to safeguard this site for future development needs, then a new robust defensible boundary would be drawn along Martyrs Lane, the Bourne Stream to the north and the Woking Borough boundary to the east, this is set out in the consultation paper. This matter has been considered within the Landscape and Green Belt Assessment carried out by Hankinson Duckett which is available on the Council's website.

**Contributor Reference:** 02626/1/001  
**Customer Name:** Mrs Marion Malcher

**Summary of representation:**

This process is based on economic growth, however this is minor when compared with the need for water, food and clean air to breathe.

Humanity faces many threats such as climate change, population growth, water stress, air pollution, species extinction and habitat loss.

Woking Borough Council policies such as CS7 protects biodiversity, the vision for Woking 2050 to create a sustainable community by maintaining a high quality environment, where resources are used wisely and biodiversity is conserved.

The Council economic development strategy outlines a modern yet quality environment, facilitating significant population and economic growth. The borough is advertised as nestled alongside a pleasant Green Belt environment.

This Green Belt is what is being proposed to be built over.

It is impossible to have constant economic growth, building more houses and at the same time protecting our Green Belt, quality of life and environment.

The Natural Woking strategy states, that human survival depends on biodiversity. The Council economic growth contradicts the environmental issues.

Strongly objects to building on any Green Belt sites and open spaces in Woking.

Objects to the Site allocation DPD process, as it does not protect the environment.

No recognition has been given to the rights of nature.

Green Belt should not be safeguarded for development due to loss of habitats, loss of biodiversity, loss of agricultural land and loss of heritage.

The representation proposes that all agricultural land be protected and include provision for allotments. Creation of a brownfield register, only social and affordable housing to be built, no building on flood plains, Green Belt to be protected and improved, under utilised Green belt land should be used as forest, a community orchard in West Byfleet, to include proposal to improve and protect wildlife, flora, heathland and habitats. The designation of SANG to be protected.

Objects to the lack of consultations of The Green Belt Review.

Objects to the process in which Regulation 18 was conducted. It remains unclear if all responses were published, there is no audit trail and the representations were dismissed with 'no further modification is proposed as a result of this representations'.

The representation proposes that all documents to be dated, name of author, version number and contact details.

Objects to the question ask at the consultation, as there are more than one option to the question, also no sites have been safeguarded, they have only been proposed. Objects to all sites being safeguarded.

The representation has included photos of the sites.

#### **Officer Response:**

Objection to the proposal and all of the other six sites is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The Council is aware of the threats humanity faces. The Core Strategy and the Development Management Policies DPD contains robust policies, to ensure sustainability and well being for the community. Particular reference is made to CS12 – Affordable housing, CS13 – Older people and vulnerable groups, CS17 – Open space, green infrastructure, sport and recreation, CS19 – Social and community infrastructure, CS21 – Design, CS25 – Presumption in favour of sustainable development of the Core Strategy and DM1: Green Infrastructure Opportunities, DM2: Trees and Landscaping, DM3: Facilities for Outdoor Sport and Outdoor Recreation, DM5: Environmental Pollution, DM6: Air and Water Quality, DM7: Noise and Light Pollution, DM8: Land Contamination and Hazards, DM21: Education Facilities and DM22: Communications Infrastructure of the Development Management Policies DPD.

Whilst the Council notes that the Green Belt provides residents with a number of benefits, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The environmental implications of the proposals will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

The Martyrs Lane site is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

The Council economic development strategy and environmental strategy are not at odds with each other. Sustainable development is a holistic approach, the balancing of all three elements are important to ensure sustainable development, these are environmental, social and economical issues.

The Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently of the Site Allocations DPD are managed to help achieve sustainable development. The outcome of the appraisal demonstrates that there are a number of negative, positive and neutral impacts for developing the site. The same Sustainability Appraisal Framework had been used to carry out a SA of the originally proposed six safeguarded sites. The SA Framework enables consistent information to be gathered to make comparative judgements between the sites. The Council therefore has

significant information to inform decisions about the most sustainable site to safeguard for future development. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

The Council acknowledges the proposed modifications to the site allocations DPD. Loss of habitat and biodiversity, flora and wildlife have been addressed above.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

As set out in the Town and County Planning (Brownfield Register) Regulation 2017, the Local Planning Authority has until the 31.12.2017 to publish its Brownfield Register. The Council is committed to preparing its register in accordance with the regulations.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability.

Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding.

Many of the Green Belt sites have multiple owners and the Council cannot dictate what each site shall be used for.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

Policy CS8: Thames Basin Heaths Special Protection Areas (SPA) of the Core Strategy accords priority to the protection of the Thames Basin Heaths SPA. The Council has identified sufficient SANG capacity through existing SANG sites and proposed allocations in the Draft Site Allocations DPD to enable the delivery of the Core Strategy and beyond. The Council will engage with Natural England to agree the nature and size of the SANG that will be needed to serve this development if it is allocated. The Council will initiate the discussion at the appropriate time.

The Green Belt boundary review report is a technical consultants report prepared to inform the Council's Site Allocations Development Plan Document (DPD). The brief for the Green Belt boundary review is available on the Council website. It is not subject to any form of public consultation as it is an evidence base document. It does not set development policies or guidelines and therefore is not required to be consulted on as per the Town and Country Planning (Local Planning) (England) Regulations 2012.

It is important to note that the Green Belt boundary review report does not allocate any land for development. It makes recommendations to the Council about land that could be taken out from the Green Belt to meet development needs, which the Council will consider in due course as part of the Site Allocations DPD process.

It should be noted that the Regulation 18 version of the Site Allocations DPD is based on a wide range of evidence base documents and not entirely on the Green Belt boundary review prepared by Peter Brett Associates. The Council has used a number of evidence base documents to inform the Site Allocations DPD. Since the publication of the draft Site Allocations DPD, the Council has also published a number of other evidence base documents including additional transport and landscape studies. Further details can be found on the Council's website as well as within the Land to the east of Martyrs Lane Consultation Document.

All the representations of Regulation 18 are on the Council Website. All were considered and presented to the Council. The Council will publish the 'Publication' version of the DPD for a Regulation 19 consultation to give the public a further opportunity to comment on the document before it is submitted to the Secretary of State for Examination. Everyone will have the opportunity to be heard at the examination if they felt that their concerns have not been satisfactorily addressed by the Council at the Regulations 18 and 19 consultation stages.

The Council acknowledges the proposed audit amendments to the site allocations process and the Council website in general. Planning Policy will review its method of communication to ensure documents are easy to find, are dated, with contact details and will take your comments into consideration. However, Council documents will not have individual author names. Planning Policy will bring this matter to the attention of the wider Council for its considerations.

The preparation of the Site Allocations DPD is the formal process that will ultimately confirm the status of each of the sites designated within it, including those that are earmarked for

safeguarding. The sites that have been identified in the Regulation 18 version are those that the Council had proposed for the purposes of safeguarding if it is examined and approved. The Land to the east of Martyrs Lane Consultation Document is careful to use the term 'proposed sites' and the introduction to the draft Site Allocations DPD also makes it clear that the sites are proposed at this stage.

The Council published the draft Site Allocations DPD for public consultation between 18th June and 31st July 2015. The publication of the draft document was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document clearly identified a number of sites that would be safeguarded for future development needs between 2027 and 2040. To clarify, the draft Site Allocations DPD safeguarded the following sites for future development needs:

GB4: Land south of High Road, Byfleet

GB5: Land to the south of Murray's Lane, Byfleet

GB9: Woking Garden Centre, Egley Road, Mayford

GB10: Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford

GB11: Land to the north west of Saunders Lane, Mayford

GB12: Land rear of 79–95 Lovelace Drive, Teggs Lane, Pyrford

GB13: Land east of Upshot Lane and south of Aviary Road, Pyrford

As well as clearly identifying specific sites for safeguarding, Paragraph 216 of the National Planning Policy Framework (NPPF) states that at this stage of the process, the document can be afforded very limited weight in the determination of planning applications. Therefore despite not being an adopted Council document, it does form part of the Development Plan for Woking Borough.

Based on the above, whilst the Site Allocations DPD has not been adopted by the Council at this stage it is clear that the formal plan making process has started and that the Martyrs Lane consultation document was correct in identifying the original sites as 'safeguarded sites in the draft Site Allocations DPD'.

**Contributor Reference:** 03019/1/001  
**Customer Name:** Mr Tim Harrold – CPRE

**Summary of representation:**

There is a clear need for the two neighbouring councils of Guildford and Woking to demonstrate a duty to cooperate in the preparation of their separate plans.

We can well understand the difficulties associated with preparing plans for the longer term future of the two separate boroughs at this time. We wish, however, to emphasise CPRE's continued commitment to the protection and maintenance of the Green Belt as a proven policy which is of enormous public benefit to the community at large in Surrey in checking the spread of unrestricted urban sprawl, the prevention of neighbouring towns such as Guildford and Woking merging into one another, and protecting the openness of the countryside from encroachment.

We are also very conscious of the purpose played by the Green Belt in assisting urban regeneration by encouraging the recycling of derelict and other urban land. CPRE has made clear to the Government its view that the development of urban brownfield sites should have priority before any further incursion into the Green Belt is considered.

CPRE argues that the further loss of Green Belt land at Woking is not valid as we maintain that there are sufficient brownfield sites in the Borough to meet the needs for future housing development without using any more Green Belt land at all. We are aware of correspondence with Councillor John Kingsbury on this topic which proposes for consideration a dozen brownfield sites that could be reviewed for further housing development including industrial sites such as at Poole Road and Day Aggregates.

CPRE believes that the permanence of the boundaries of Green Belt land is a fundamental principle of national planning policy. The Government has consistently stressed the importance it attaches to protecting the Green Belt and maintaining its aim of preventing urban sprawl by keeping land permanently open. The essential characteristics of Green Belt are emphasised repeatedly as their openness and permanence. New Green Belt boundaries should only be established in exceptional circumstances at the time of a local plan review. In our opinion the term "exceptional circumstances" is clearly much more stringent and robust in policy terms than "very special circumstances", and is therefore by definition a unique, rare, unusual and one-off event.

There has also been an emphasis on the high priority that should be given to local decision-making which is reflected in the encouragement given to Neighbourhood Planning where most Local Parish Councils in Guildford and Residents Associations in Woking seek to ensure that Green Belt remains untouched by encroachment. National policy has reiterated its determination to give priority to brownfield development and higher density urban housing which is designed for affordable pricing.

CPRE is concerned about the definition of "safeguarded land" . Objection to the loss of Green Belt land as "safeguarded" for possible future use for house building has for example been a prominent element of concern for Worplesdon Parish Council in Guildford. We maintain that the "exceptional circumstances" which were allocated for the McLaren expansion to use Green Belt land no longer apply and therefore cannot be carried forward now. The justification of Green Belt loss for "exceptional circumstances" is no longer valid.

NPPF makes it apparent that Government policy attaches great importance to the Green Belt designation, and subsequent clarification has made it even clearer that housing shortage is not to be considered as an "exceptional circumstance". This is especially true in Surrey where pressure to build on Green Belt land is a constant threat to the openness of the rural countryside because of its proximity to London.

CPRE believes that each individual Green Belt site proposed for development in Woking should be reassessed and evaluated afresh as to whether "exceptional circumstances" really apply for their consideration for housing use. We have been particularly concerned to note the way in which work has been progressing for Hoe Valley School on the Egley Road to which CPRE Guildford objected. We are concerned not only at the loss of Green Belt but also the problems of sustainability that we can anticipate as a result of this development.

#### **Officer Response:**

The Council is of the opinion that the case for releasing Green Belt land, including exceptional circumstances and safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper, with particular reference to section 1 and 2.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. Please refer to the 'Duty to cooperate bodies topic paper' for the Council response.

The Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine

its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's

ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The Council has comprehensively assessed brownfield sites as part of the evidence to inform the Site Allocations DPD. The Council has published detailed information on previously developed land (brownfield land) that is suitable, available and achievable for housing and employment purposes. This is contained in the Strategic Housing Land Availability Assessment (SHLAA) (2015), the Employment Land Review (2009) and Employment Topic Paper (2015). The documents are on the Council's website at [www.woking.gov.uk](http://www.woking.gov.uk). The Council has also carried out and published a Sustainability Appraisal Report that assesses all reasonable alternative brownfield sites in a consistent manner against a set of sustainability objectives, including environmental, social and economic objectives. The available evidence on previously developed land is sufficiently comprehensive and robust enough to enable informed decisions about the preferred sites being proposed for allocation in the DPD. The evidence also demonstrates that the preferred sites are the most sustainable when compared against other alternative sites. It is important to highlight that there is no presumption that land which is previously developed is necessarily suitable for residential development. Officers will consider any other sites that will be suggested for consideration in response to the Regulations 18 and 19 consultations on the DPD.

The industrial sites at Poole Road site UA17 and Day Aggregates site UA41 have both been allocated in the draft Site Allocations DPD. Site UA17 for mixed use development to comprise of offices, warehousing and a new energy station. Site UA41 has been allocated for residential, including affordable housing.

In terms of high density development and affordable housing, as set out in the draft Site Allocations DPD sites have been allocated within the Town Centre which are high density and have affordable housing this is to support the aims and objectives of the Core Strategy policies CS1 and CS2.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Paragraph 85 of the NPPF explains that safeguarded land is 'not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;'. The land is safeguarded for future development needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Officer's would agree that the determination of a planning application is a distinct planning process which is different from the Site Allocations DPD process.

Whilst Hoe Valley school is outside the scope of this consultation, the merits of the proposal and the case put forward by the applicant to demonstrate 'very special circumstances', was dealt with at the Planning application stage.

**Contributor Reference:** 03021/1/001  
**Customer Name:** Pырford Neighbourhood Forum

**Summary of representation:**

LDA Design consultant write on behalf of the Pырford Neighbourhood Forum (PNF) in relation to the above consultation.

PNF has submitted evidence to WBC previously making strong objections to the inclusion of the Pырford sites as safeguarded land.

A technical report commissioned by PNF from LDA Design Consulting Ltd. The report undertakes a comparison exercise of the land east of Martyrs Lane site and the two Pырford sites.

The consent for the McLaren (LPA ref.11/0823) has established the principle that development is acceptable east of Martyrs Lane site and the site can accommodate substantial development without significant harm.

The safeguarding of the land east of Martyrs Lane site would remove the need for all six of the other potential sites safeguarded, including the two sites at Pырford. WBC evidence indicates the capacity of the land east of Martyrs Lane site (excluding the golf course) is at least 1024 new dwellings

The evidence indicates sympathetic development of the land east of Martyrs Lane (excluding the NZ Golf Course) would permit the key characteristics of the site to be retained especially as there is a current substantial amount of boundary vegetation screening.

The land east of Martyrs Lane site is in poor condition. Whilst the New Zealand Golf course in the south of the site is in operation, both the Woodham Sports Club pitches and courts and tree nurseries are no longer active and now in a state of disrepair. There are no public rights of way within the land and it provides no contribution to public recreational amenity.

The sites at Pырford are well managed, in active agricultural use and nearby footpaths provide much utilised recreational facilities for many Borough residents who relish the natural environment which WBC now endorses in the Natural Woking Strategy.

In 2015 the last SHLAA was published. At the time 2 sites in Martyrs Lane were offered but ignored and given that McLaren planning permission had been revoked the Martyrs Lane site should have been reintroduced to the Site Allocations Development Plan Document before the Regulation 18 Consultation in June 2015..

The need for permanent and defensible boundaries for any site allocation and amend Green Belt boundary. The strong physical features on the ground at the land east of Martyrs Lane

site, including the mature vegetative network and The Bourne stream, would allow a number of options for a permanent and defensible Green Belt boundary to be drawn.

WBC consultants seem to be at variance with each other and there seems to be a massive increase in the importance of Martyrs Lane to the Green Belt over the last 2 years. PNF would like to highlight that the majority of the land north of NZGC was found appropriate for a 60,000 sq. m factory. This does seem consistent with the view that the site is of critical importance to the Green Belt.

Site Capacity, referring to 3.4.1 of the HDA report we note that there is the potential for 900 dwellings on Parcel A. However, Parcel A does not include the SCC site of approximately 8.5 hectares offered in the SHLAA process which we estimate is sufficient for housing required to meet the original requirement of 1024 dwellings on safeguarded development land for the 2027–2040 time frame.

The Technical Report is summarised below.

LDA Design was appointed by PNF to respond to the consultation. The report examines the existing evidence base of the site allocations DPD for Martyrs Lane (Parcel 2) and Pyrford Fields (Parcel 9a and 9b) such as the five purposes of the Green Belt, Woking Green Belt review, The Green Belt Assessment, Environmental constraints (flood risk, biodiversity), Strategic Accessibility, local communities, landscape character and sensitivity to change, and Sustainability Assessment.

The report goes through WBC evidence from the Peter Brett Associates Report and the different stages to assess Green Belt Land for Parcel 9 and Parcel 2.

The assessment concludes Parcel 9 has "Very Low suitability as an area of search", with the land "Fundamental to the Green Belt".

In comparison, Parcel 2 (Martyrs Lane) was judged to be of Major importance for all 3 Green Belt purposes. The assessment concludes that Parcel 2 has "Low suitability as an area search", with recommendation to "Retain the Land in the Green Belt" for Parcel 2.

Parcel 2 is specifically noted in Paragraph 3.5.5 as an area with low suitability for removal from the Green Belt and consequently should be considered. By comparison Parcel 9 is considered to have very low suitability.

The Sustainability assessment looked at environmental constraints.

Parcel 2 – Minor constraints– In this parcel, there are several minor constraints to the north, including a very small area considered to be in Flood Zone 2, some Grade 3 Agricultural land and Safeguarded Mineral Resources (SMR). About a quarter of the site has also been assessed for potential contamination, and a large area is considered to be a Biodiversity Opportunity Area (BOA). South–west of Martyrs Lane is a Site of Nature Conservation Importance (SNCI).

These constraints not considered to be major and could be accommodate in development with design or mitigation.

Parcel 9 – Major constraints – About half of this parcel is classified as grade 3 agricultural land, with some Grade 2, but the part adjacent the urban area is classified as Urban. The eastern part is safeguarded as a potential mineral resource, and the topography is fairly steep. A large proportion of this parcel is identified as an 'Escarpment and rising ground of Landscape importance. Due to the prominence of the escarpment in the landscape, it is likely that only the western half of the parcel is developable.

Accessibility to Woking Town Centre – The parcels which scored most highly in terms of strategic accessibility were located in several clusters around the edge of the urban area, such as Parcel 2.

Community facilities – proximity to local centres, schools, health centre, community centre and barriers.

Overall, Parcel 2 was ranked 2 and parcel 9 was ranked 18 in terms of sustainability.

Capacity for Change (Based on Landscape Character & Sensitivity) Parcel 2 is low and Parcel 9 is little/none low.

Whilst the Green Belt Review identifies that Parcel 9 is unsuitable in terms of a Green Belt Assessment and Landscape Character assessment, it suggests that the north-western part of the site is less sensitive due to its landform.

It proposes that 'sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road' and that it would be feasible for a small area of development in the narrow field between the field and Tegg's Lane to the north. The Green Belt Review recognises that consideration would need to be given to the setting of the Registered Park and Garden at Pyrford Court on the other side of Pyrford Common Road, and the existing boundary tree belt, but it well located in proximity to local community facilities. .

Parcel 2 was not reintroduced to the assessment, despite it originally being considered overall more suitable for Green Belt release than Parcel 9.

LDA Design reviewed the Green Belt Methodology and found 'availability' as an overriding determinant as to whether a parcel of land should be released is problematic. The Green Belt Review should rank the land parcels according to their Green Belt purposes and sustainability credentials.

Baseline studies such as landscape character assessment and Conservation area appraisal were missing.

It was considered that too much weight has been placed on site 'availability' as a key indicator of deliverability for allocating sites for Green Belt release beyond the plan period. There is a lack of consideration as to the consequences on the overall shape and functioning of the Green Belt to inform decision makers.

The Green Belt Review only considered development parcels in isolation without referring back to an overarching set of sustainability or growth objectives.

The weight given to land use and availability are unlikely to deliver sustainable development.

The weighting applied to the various strands of the assessment process (Green Belt purposes, sustainability criteria and landscape capacity) – is not transparent. This makes it difficult to draw comparisons between different parcels.

There are inconsistencies in the way parcels have been assessed. Some have been given 'split' score in relation to landscape capacity, while others have benefited from a more detailed analysis of particular area or sites within the parcel.

LDA Design ranks Parcel 9 as the least suitable land area when compared to all of the other parcels. The Green Belt Review indicates that Parcel 9 has 'low-medium' sustainability performance; 'little/no' and 'low' capacity for change; 'major' environmental constraints; and fulfilling two 'critical' Green Belt purposes.

LDA Design review of Parcel 2 has generally low potential for Green Belt Release due to existing land uses and landscape character constraints, although the area of land adjacent to the McLaren site warrants further investigation.

LDA Design ranked parcel 2 as 7 and parcel 9 as 14 in terms of sustainability.

LDA Design considers in this report that the judgements and assessment relating to the Green Belt functions, sustainability, environmental constraints and landscape capacity of Parcel 9 are broadly correct. While LDA Design recognised that Parcel 9 has some local variations in character, it is predominately rural in character and contributes to the setting of the urban and the historic environment.

Overall, the report concluded that the development of all or part of Sites 9a and 9b will inevitably change the character of the land itself and its immediate surroundings, and will result in harm to landscape character and views and alter the countryside context of the Registered Park and Garden, Avery Road Conservation Area and Pyrford Village. This Parcel is identifiable as countryside which is of inherent value even though it has no blanket formal statutory protective designation. The development of Site 9b in particular would be contrary to planning policy guidance, which seeks to protect the character of the escarpment.

The field margins and woodland belts have potential to provide valuable habitat for dormice, bats, badgers and invertebrates. There are also two water bodies within 250 m of the Sites which may have potential to support great crested newts.

In relation to heritage, Sites 9a and 9b adjoin two Conservation Areas (Pyrford Village and Aviary Road); Pyrford Court Registered Park and Garden; a number of Listed Buildings; and an Area of High Archaeological Potential.

The surrounding fields were once farmed by the residents of Pyrford.

It is considered that any development proposals will need to include sufficient land for access; offset from surrounding trees, allowing for root protection and creating habitat corridors, space for surface water drainage; and public open space.

The site could accommodate less than 223 dwellings.

The LDA examines the Hankinson Duckett Associates Report which looked at Martyrs Lane only.

HDA's assessment states that the Martyrs Lane site's characteristics are similar to the wider landscape as defined in the local character assessment, but the relationship between the site and its surrounding landscape is low due to the site's high containment.

HDA concludes that Martyrs Lane parcels are critically important in their contribution towards 2 purposes of the Green Belt, which is an increase on the Major importance deduced in the Green Belt Review.

However, in regards to capacity for potential development, the HDA report concurs with the Green Belt Review in that Parcel 2 has a 'low capacity'. However, HDA states that whilst the southern extent of Parcel 2 presently has an overall low capacity for change, the area to the north has the potential to accommodate development on the former sports pitches and tree nurseries, and a precedent has been set by McLaren's (revoked) outline planning permission.

Overall, HDA conclude the whole Martyrs Lane site is of critical importance to the purpose of the Green Belt, with critical importance contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The site is also of critical importance to the landscape character of the wider area. A significant change to the character of the site, as well as substantial vegetation losses would need to occur in order to accommodate the dwelling numbers currently envisaged to meet Woking's assessed housing need.

Discuss WBC Planning Committee report in relation to an Outline Planning Application for the McLaren Group Ltd for a New Applied Technology Centre in regards to the five purposes of the Green Belt. The Committee Report concludes with the recommendation the Local Planning Authority is minded to grant planning permission subject to conditions and S.106 agreement. As the application involved development within the Green Belt the application was referred to

the Secretary of State who subsequently confirmed that there as no need for the application to be reviewed by an Inspector, and that the application could be determined locally.

LDA Design looks at harm to the Green Belt, sustainability, suitability, landscape character and sensitivity to change which it has discussed previously in the report.

The Hankinson Duckett Associates report and Peter Brett report was compared in regards to landscape, harm to the Green belt, sustainability, environment, suitability, sensitivity to change and compared parcel 2 and parcel 9.

In terms of incursion into the Green Belt, while the HDA suggests that development would make a significant incursion into the Green Belt, it also concludes that it could be possible to accommodate proposed housing without significant effect on valued landscape features if development was contained within the centre of Parcel and the perimeter of existing features on the site was used to screen proposed development. This assertion supports the HDA conclusion that it would be possible install new clear, strong and durable boundary to the site.

Although the Green Belt Review provides a caveat to the Sustainability Assessment results, it is clear from the findings that Parcel 2, on balance, is more suitable for development than Parcel 9.

Though Parcel 2 was excluded from this Stage of the Green Belt Review, an area of Parcel 9 was reintroduced as suitable for consideration despite being ruled out during the Green Belt and Sustainability Assessments as it fulfilled two ' Critical' Green Belt purposes, with poor sustainability and high landscape sensitivity. PBA concluded an area to the north-west of Parcel 9 offered a reasonable opportunity to develop a small area of potential housing that overruled the constraints set out above.

while Parcel 9 could provide a small area of development, there are a number of alternative location more suitable locations that were ranked higher in the PBA Green Belt and Sustainable Assessment that should have been considered first, this includes Parcel 2.

Although Parcel 2 has some association with the wider landscape, it is generally disconnected from the prevailing rural landscape that surrounds it. As such, HDA propose that provided all necessary and appropriate mitigation measures were undertaken, there would be scope to develop areas of Parcel 2.

From analysis of the existing evidence base, including the WBC's own evidence base key themes are apparent:

Land east of Martyrs Lane (Parcel 2) is more appropriate as an area of search for release from the Green Belt than the Pyrford sites (Parcel 9).

Parcel 2 has less environmental constraints, is more sustainable, more suitable and less sensitive in landscape character and visual terms than Parcel 9. It also has greater capacity to accommodate change.

The report includes a comparative table between PBA report, HDA report and their LDA design reports.

#### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal. It is stressed that the planning consent for the McLaren proposal does not establish the principle of residential use of the site. The McLaren proposal is for a technology centre justified by special circumstances on the individual merits of the schemes, which is an entirely different use to the one being proposed by the Council. To suggest that the principle of development has been already established is wrong in this regard. Any comparison of the safeguarding options should be based on the use for which the land is to be safeguarded, which is residential and any supporting infrastructure that might be necessary.

The fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence. It is clear from this context that the Green Belt is not about the quality of the land. Whilst the quality of the land may be taken into account, it does not override the fundamental aim of the Green Belt.

Paragraph 6 of the NPPF defines the purpose of the planning system. It is to contribute to the achievement of sustainable development, and the policies in paragraphs 18 – 219 of the NPPF taken as a whole constitutes the Government's view of what sustainable development in England means in practice for the planning system. It is within these broad principles that the Council's decision on the preferred approach to safeguarding would be made.

The consultation document is clear to emphasise that if the Martyrs Lane site is to be safeguarded, it should be capable of enabling the delivery of at least 1,200 net additional dwellings. It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. On grounds site capacity, there is not much between the two

options. Also, a number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Council's consultation document clearly defines by a Map the area being proposed for safeguarding. This includes the New Zealand Golf Course. The consultation document does not specify which parts of the land will be developed for what purpose. The attempt by the representation to exclude New Zealand Golf Course is misleading and presumptuous at this stage. Consideration of the representations received will help inform the Council of how the site could be developed if it is safeguarded and whether or not the New Zealand Golf Course should be developed. The New Zealand Golf Club has made representation as part of the consultation and has confirmed that the Golf Course will not be available for development. This has implications for the deliverability of the land and as such it is a material consideration that the Council will take into account recognising that the overall aim of the Council will be to help achieve sustainable development.

It should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. As highlighted above, New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land (without the New Zealand Gold Course) will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites including the Pyrford sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic

Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. The Council fully appreciates the importance of the Green Belt and its multiple uses to the local community. However, the Council also has a responsibility to plan to meet the housing needs of the community. The balance between these conflicting objectives has been comprehensively discussed at the Core Strategy Examination in establishing the principle for releasing Green Belt land to meet future housing need. Whilst it would be wrong for the Council to put a value on the importance of the Green Belt to the local community, the overall total of Green Belt land proposed to be released from the Green Belt (excluding Martyrs Lane) to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. Even that, the Council has been concerned to make sure that any land it releases from the Green Belt does not undermine its overall purpose and integrity, and it has carried out a significant body of evidence to help achieve this objective. The representations received during the consultation will also significantly assist.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally ignored. They were carefully considered and rejected.

The Green Belt boundary review report provides sufficient evidence that the release of the proposed allocated sites from the Green Belt will enable a defensible boundary to be drawn that will endure over a long period of time beyond the Core Strategy period. Where the recommendations of the Green Belt boundary review report regarding where the defensible boundary could be drawn had not been accepted by the Council, a clear reason has been given.

The proposed Green Belt boundary has been drawn to follow the edge of the development sites in Mayford. For sites GB8, GB9, GB10 and GB14 there will be a continuation of the existing urban area which is well defined by Saunders Lane to the south and Egley Road to the east. The

Green Belt boundary to the west has been defined by site GB11 which is adjacent to the Hook Heath escarpment. This will protect the purpose of the Green Belt and not undermine the integrity of the escarpment. Site GB12 has a strong defensible boundary of Lovelace Drive, Teggs Lane and Upshot Lane. GB13 boundaries are Upshot Lane, a public footpath and Church Hill. Site GB7 will continue to remain within the Green Belt and therefore the Green Belt boundary will not change in this particular location. In this regard, there are no perceived relative advantages over each other.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. The conclusions of the report are broadly similar to the Green Belt boundary review report by Peter Brett Associates. As mentioned before the reference to the development management Officer's report is unreasonable and misleading as that process differs to the site allocation process.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt. It should be noted that the prevention of urban sprawl is a fundamental aim of the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with

regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the

site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The environmental implications of development, regardless of whether it is in Pyrford or elsewhere, will be fully assessed as part of the development management process, and appropriately mitigated. The impact of development on the escarpment can be reduced by reducing the amount of residential development and increasing the proportion of open space allocated for GB13, as set out in the sustainability appraisal.

Regarding accessibility to services and facilities, it is correct that GB12 and GB13 are not within reasonable walking distance of Woking town centre or an existing secondary school. Nevertheless they are within a reasonable walking and cycling distance of Pyrford Neighbourhood Centre which meets the day to day needs of local residents. They also benefit from a limited public transport service. The Council recognises that regardless of what sites are safeguarded for future development needs, it will be necessary to work with bus service providers to improve service provision and frequency.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If

any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The points raised about the Green Belt Methodology, sufficient land for access and the site can accommodate less than 223 dwellings have been previously addressed in the Reg 18 consultation, (refer to the Council response under Mr Kratt).

The findings in the LDA Design report are noted. The overall purpose of the Site Allocations DPD is to deliver the requirements of the Woking Core Strategy. The Council is satisfied that the depth and breadth of evidence used to support the Core Strategy and the Site Allocations DPD are sufficiently comprehensive, robust and was able to withstand scrutiny at the Core Strategy Examination and similarly will be defensible at the Site Allocations DPD Examination.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently of the Site Allocations DPD are managed to help achieve sustainable development. The outcome of the appraisal demonstrates that there are a number of negative, positive and neutral impacts for developing the site. The same Sustainability Appraisal Framework had been used to carry out a SA of the originally proposed six safeguarded sites. The SA Framework enables consistent information to be gathered to make comparative judgements between the sites. The Council therefore has significant information to inform decisions about the most sustainable site to safeguard for future development. It goes without saying that after balancing all the relevant factors, the

Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

**Contributor Reference:** 02571/1/001

**Customer Name:** D Emery

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

Fewer residents will be disrupted by one site than by six individual sites.

Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02570/1/001

**Customer Name:** A Emery

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

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The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

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The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02577/1/001

**Customer Name:** E H Gaydon

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

Fewer residents will be disrupted by one site than by six individual sites.

Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02579/1/001  
**Customer Name:** Ms Penelope Hatsell

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
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**Contributor Reference:** 02581/1/001  
**Customer Name:** Mrs M E O'Keeffe

**Summary of representation:**

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Planning permission was recently granted for the top part of the site.  
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The northern site is publicly owned land so the sale would help council tax payers  
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**Officer Response:**

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02582/1/001  
**Customer Name:** Mrs P Coatworth

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02639/1/001  
**Customer Name:** Mr Mark G Boffee

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 01399/2/001  
**Customer Name:** Mr Ian Makowski

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

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The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02984/1/001  
**Customer Name:** Mr Harry Heaton

**Summary of representation:**

This is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, in favour of substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

Martyrs Lane site is more suited based on the Brett Woking Green Belt report which states Pyrford has Very Low Suitability for removal from the green belt rather than Low for ML. The same report also states that the Environmental constraint would be greater in Pyrford than at ML as well as the fact that the impact on the rural character of Pyrford would be greatly affected which is not the case at ML.

Whilst Goldsworth Park is bigger than what is being proposed here, it clearly demonstrates that if you build from scratch large housing developments then you can provide the services needed to make it work for the residents, as opposed to the proposed bolt on sites which will only put huge pressure on already stretched services, such as doctors surgeries, schools and traffic management.

It has been mentioned that 3500 are needed, but I am not sure where that figure comes from as the 6 sites only totals 1024 so this consultation should only be relevant to that number which fits into the area north of NZ Golf Course.

## Officer Response:

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation

is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low

suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

**Contributor Reference:** 02985/1/001  
**Customer Name:** Jennifer Cooper

**Summary of representation:**

Objects to the proposal of including land at the East of Martyrs Lane for housing in the future.

Some of the proposed area is Green Belt land and therefore should be protected as such.

With the development of the Fairoaks site, there would be no green space remaining to prevent urban sprawl.

The site is within a significant flood plain, and therefore development should be avoided to prevent unnecessary flooding in the future.

With the large developments at Fairoaks and Sheerwater, the pressure on already busy existing roads will be great such as the A320, Six Crossroads Roundabout, Sheerwater Road and Woodham Lane.

There is very little public transport serving the area.

Existing services such as schools, doctors surgeries and hospitals which are already under strain will be adversely affected.

There will be a loss of habitat for wildlife, including foxes, deer, badgers, grass snakes, shrews and voles.

There will be a loss of trees and woodland, affecting bats, owls, birds of prey and other protected birds.

The area for development is within flight paths.

Martyrs Lane recycling centre would be in the middle of the proposed development and unacceptable due to social and environmental issues as well as traffic issues along Martyrs Lane, Woodham Lane and the A320.

The land is not geologically sound to support a housing development.

On the basis of these objections, several other smaller sites should be identified for future development , rather than this one that can not be adequately supported on multiple levels.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02986/1/001  
**Customer Name:** Mr Dennis Cooper

**Summary of representation:**

Objects to the proposal of including land at the East of Martyrs Lane for housing in the future.

Some of the proposed area is Green Belt land and therefore should be protected as such.

With the development of the Fairoaks site, there would be no green space remaining to prevent urban sprawl.

The site is within a significant flood plain, and therefore development should be avoided to prevent unnecessary flooding in the future.

With the large developments at Fairoaks and Sheerwater, the pressure on already busy existing roads will be great such as the A320, Six Crossroads Roundabout, Sheerwater Road and Woodham Lane.

There is very little public transport serving the area.

Existing services such as schools, doctors surgeries and hospitals which are already under strain will be adversely affected.

There will be a loss of habitat for wildlife, including foxes, deer, badgers, grass snakes, shrews and voles.

There will be a loss of trees and woodland, affecting bats, owls, birds of prey and other protected birds.

The area for development is within flight paths.

Martyrs Lane recycling centre would be in the middle of the proposed development and unacceptable due to social and environmental issues as well as traffic issues along Martyrs Lane, Woodham Lane and the A320.

The land is not geologically sound to support a housing development.

On the basis of these objections, several other smaller sites should be identified for future development , rather than this one that can not be adequately supported on multiple levels.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02987/1/001

**Customer Name:** Sorcha Dando

**Summary of representation:**

Does not agree to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

Green belt – loss of green belt.

Urban sprawl and Fair Oaks development plans.

Flood risks – due to more covered area and loss of trees.

Transport – roads – pressure on existing roads, especially A320.

Transport – public – lack of public transport.

Infrastructure – huge stress on existing services and with no plan to build more schools and hospitals in the area.

Wildlife – loss of habitat.

Woodlands – loss of trees and woodland.

Flight path – development is in the flight path.

Martyrs Lane recycling centre – located right in the middle of the proposed development.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02988/1/001  
**Customer Name:** Mr Vincent Withers

**Summary of representation:**

Some benefits associated with the Martyrs Lane Proposal. However, concerned about all the different planning proposals in the Woking area and the crucial requirement for infrastructure not being addressed.

There are existing problems with roads, schools and medical facilities. All the proposals will be having such problems.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02989/1/001  
**Customer Name:** Mr And Mrs Alec And Catherine Beattie

**Summary of representation:**

Against the possible development of the two Pyrford fields and in favour of the development north of Martyrs Lane.

Pyrford's Green Belt is a unique semi rural setting, largely unspoilt with open views south with the two threatened fields forming a key part of the escarpment. These two fields have been farmed for centuries and the area highlighted in the Pyrford Neighbourhood Plan.

Green Belt land in Pyrford is very accessible and actively used by walkers, runners, cyclists and others from all across the Borough. By contrast Martyrs Lane is not easily accessible and in comparison rarely used by the public despite it's Green Belt status.

The Pyrford Green Belt is an irreplaceable asset with several conservation areas.

The Martyrs Lane site is partly developed and derelict. There is no landscape element, no known footpaths and is unused by the public.

In 2012 planning permission was granted to McLarens for the northern part of the site. The work done to demonstrate its viability as a factory stands, so the building of houses is equally viable.

The Brett Green Belt report classified the two fields in Pyrford as having little or no capacity for change and very low suitability for being removed from the Green Belt: the Martyrs Lane site has no landscape designations, has been partially developed in the past and is classified as having low suitability for being removed from the Green Belt. The Martyrs Lane development should be selected on these criteria alone.

With its easy access to the A320 and M25, the Martyrs Lane development has better major road links than Pyrford with its B and C roads, so fewer residents would be impacted by travel disruptions.

Housing in Pyrford is expensive and more executive type homes would not provide key worker homes for employers like McLarens and St Peter's Hospital, which are nearer to the Martyrs Lane development.

Pyrford CofE Primary School is already full and has taken many pupils from the Maybury area. The Martyrs Lane site would be an ideal opportunity to build a new school and more affordable housing as part of the development plan.

The West Byfleet Health Centre is fully subscribed. With the potential number of new dwellings at Martyrs Lane, there would be an opportunity to build a new health centre and relieve current healthcare resources at the West Byfleet facility.

**Officer Response:**

Objection to development on the two Pyrford fields and support for the land to the east of Martyrs Lane is noted.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02990/1/001  
**Customer Name:** Mr And Mrs J A Clements

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs.

Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations

DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02991/1/001  
**Customer Name:** Mr Andrew Kirby

**Summary of representation:**

The residents of the village feel very strongly that there should not be substantial growth in the size of the village due to development. The proposed developments near Teggs Lane and Upshot Lane, will destroy large areas of green belt surrounding the village. It is this green belt area that has stopped Pyrford from merging with Woking town, enabling Pyrford to maintain it's character as a small local village.

Support any adjustments to the Site Allocations that will mean that the proposed developments near Teggs Lane and Upshot Lane are no longer required. Please ensure that this representation is allocated not only to the current Consultation on the land east of Martyrs Lane but also to any other proposed changes to Site Allocations that affect the village of Pyrford.

**Officer Response:**

Objection to development on Pyrford fields and support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

Whilst the representation wishes to be considered for future consultations relating to development proposals in Pyrford, the Council is currently unable to fulfil this request as each representation must be received by the Council during the prescribed consultation period. Any representations received before or after the consultation period are not 'duly made' as per the Regulations. The Council will at the publication stage ('Regulation 19 consultation') of the Site

Allocations DPD, notify the public as well as those who are on the planning policy mailing list of the exact dates to submit any representations they may have.

**Contributor Reference:** 02535/1/001  
**Customer Name:** Mr And Mrs R N And F Sumner

**Summary of representation:**

Support for the Martyrs Lane proposal. It contains previously developed land and a single site will provide economies of scale to address infrastructure issues.

Wrote to the Council as part of the Regulation 18 consultation to object to development in Pyrford. Objects remain the same, namely that there is a lack of infrastructure to cope with significant development and that there would be damage to the natural environment. The land is also appreciated by the local community. Regulation 18 representation attached.

The Martyrs Lane site is a sensible solution to providing housing for the future and a good choice of land to build on.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the

safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The reasons against development in Pyrford as set out in the representation are noted. The Council has previously responded to this particular representation in its response to the Regulation 18 consultation. This response can be found on the Council's website.

**Contributor Reference:** 02537/1/001  
**Customer Name:** Mr Ian M Lachowicz

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs.

Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations

DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02538/1/001  
**Customer Name:** Ms Alison Woodroffe

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs.

Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations

DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02539/1/001  
**Customer Name:** Ms Angela Doyle

**Summary of representation:**

Support for the Martyrs Lane proposal.

No planning permission for any large scale development in the borough should be granted until upgrades to essential infrastructure have been put in place.

Difficult consultation as all sites are within the Green Belt. Support the Martyrs Lane proposal excluding the New Zealand Golf Course. No building on New Zealand Golf Course is necessary to deliver 1024 dwellings.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs.

Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL

contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);

- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to

manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02540/1/001  
**Customer Name:** Ms Helena Thompson

**Summary of representation:**

Support for the Martyrs Lane proposal.

Good transport links into Woking and onto the M25 towards Heathrow.

It will be a community, not just a housing estate, as there will be enough room for houses, shops, school and health centre, allowing residents to access all the essential services within their neighbourhood. It would be harder to create a sense of community in smaller separate sites compared to one large cohesive site. Potentially a larger site can include community space, green space, etc.

The inclusion of a health centre, school and shops will mitigate the impact that residents from 1,200 houses would otherwise have on Woking town centre and neighbouring areas. Residents would not need to travel far to reach these services and the existing health centres and schools would not struggle to meet the new demand.

There would be enough space for affordable housing.

Martyrs lane has no national or local landscape designation.

As all the housing would be situated in one place, there would be a mix of housing for a wide range of people.

There is a presumption that the land is suitable for development as McLaren has previously been given planning permission to build on the site.

Most of the site is not in Flood 2 and Flood 3 areas, meaning that the majority of the site is fairly safe from future flooding which is a key consideration.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it.

As most of the housing need for the borough is internally generated, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. In addition, the Council has a number of planning policies and best practice design guidance that will make sure that development will be to a high standard. By also supporting development with adequate infrastructure, this will minimise any social, environmental and infrastructure pressures in the area as a result of the development. Overall the Council is satisfied that development at any of the proposed safeguarded sites will not undermine the social fabric of the borough and specific communities within it.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six original sites. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape character of the borough and any specific landscape designations. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of

Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Core Strategy Policy CS11: Housing mix states that all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local housing needs. This policy would apply to development at any of the proposed sites in the Site Allocations DPD and therefore there is no particular advantage of the Martyrs Lane site in this respect.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

**Contributor Reference:** 02542/1/001  
**Customer Name:** Mr Andy Maddock

### **Summary of representation:**

Keen to retain the Green Belt where possible. Main concern refers to the additional traffic on the roads that do not have the capacity.

Support for the Martyrs Lane proposal.

The roads in Pyrford are congested and not safe.

A new primary and secondary school will be needed as demand can not be met in existing schools. The other sites also face similar issues and this will need to be addressed at all locations.

The roads around Martyrs Lane are already built for traffic and this will mean less disruption. Infrastructure will only need to be provided once. Traffic to the M25 and Woking would not affect smaller routes.

Much of the Martyrs Lane site has been developed already or has had planning accepted on it so the precedent has been set. The Pyrford site is in agricultural use.

The campaign against using Martyrs Lane is full of incorrect information. The proposal is much cheaper, less disruptive and the more environmentally responsible option.

### **Officer Response:**

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on infrastructure provision, namely education and transport infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In addition, the County Council is the education provider for the area and its views on education provision will be seriously considered if the site is to be allocated. If the need for additional education provision is proven at the time of the review of the Core Strategy and or the Site Allocations DPD, the Council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and or developed.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The merits of the Martyrs Lane site as set out in the representation will weigh in the balance of considerations by Members.

**Contributor Reference:** 02430/1/001  
**Customer Name:** Mr Paul Latham

**Summary of representation:**

Some of the site is previously developed which is not true of the other proposed sites.

Safeguarding one large scale will mean economies of scale to find solutions to the infrastructure concerns.

In contrast, regarding the two sites in Pyrford:

The A245 through West Byfleet and over the M25 is at capacity especially when other new development in the area is taken into account.

Pyrford Green Belt is accessible and used for recreational purposes. This is not the case for Martyrs Lane.

The Pyrford sites are surrounded by heritage assets and features and are an integral part of the heritage setting of the area.

Pyrford Green Belt is protected by Policy CS24 – Escarpments and rising ground of landscape importance.

The Pyrford fields are used for agricultural purposes and provide good quality agricultural land. They also make a major contribution to the rural character of the area.

Martyrs Lane is more suitable for development as it would have less impact on the landscape. Would prefer no further development in the area at all. Woking's roads are congested and over capacity and the existing infrastructure can not support further new residents.

It is not essential that the New Zealand Golf Course be considered for development. The northern section of the site is capable of delivering all the 1024 houses required.

**Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response

to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from

various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Regarding the representation on heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst the representation notes a preference for no further development in Woking, it should be noted that the Council is fully committed to the comprehensive delivery of the Core Strategy which seeks to facilitate the delivery of 4964 dwellings over the plan period, in addition to a significant amount of retail and office development. The Site Allocations DPD is therefore an important document that will identify specific sites for development and safeguarding.

Regarding the representation on the New Zealand Golf Course, as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the

waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 00374/2/001  
**Customer Name:** Ms Alison Kirby

**Summary of representation:**

Supportive of the proposal as it would render sites GB12 and GB13 in Pyrford unnecessary for allocation.

The residents of Pyrford village feel very strongly that there should not be substantial growth in the size of the village due to development. As a result of the 2016 referendum, Woking Borough Council are required to give due consideration to the views of the residents of Pyrford in their planning decisions.

The proposed developments near Teggs Lane and Upshot Lane, Pyrford for the building of over 400 properties will destroy large areas of green belt surrounding the village. It is this green belt area that has stopped Pyrford from simply being swallowed up by Woking town, enabling Pyrford to maintain it's character as a small, local village.

**Officer Response:**

The Council accepts that any land taken out of the Green Belt will lead to a reduction of the amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives. The Sustainability Appraisal Report provides the evidence to support this view. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about 3.46% of the total area of the Green Belt.

The Green Belt Boundary Review assessed parcels of land against the purposes of the Green Belt, one of which is preventing neighbouring towns from merging into one another, and another purpose is to check the unrestricted sprawl or large built-up areas. The Council do not consider that the potential development of identified parcels around Pyrford would significantly reduce separation between towns or lead to unacceptable urban sprawl.

There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved.

Overall, the Council is satisfied that the social, environmental and economic character of Pырford will not be significantly undermined.

**Contributor Reference:** 02441 /1 /001  
**Customer Name:** Ms Amanda Hoyle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02443/1/001

**Customer Name:** Mr Ian Ross

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02451/1/001

**Customer Name:** J C M Hughes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02457/1/001  
**Customer Name:** Ms Susan Stacey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02461 / 1 / 001  
**Customer Name:** Ms Samantha Clifton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02462/1/001

**Customer Name:** Kiri Garner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02466/1/001  
**Customer Name:** Ms Jannifer Simpkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02476/1/001  
**Customer Name:** Ms Sandra Wylie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02482/1/001  
**Customer Name:** Ms Sue Dackham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02483/1/001  
**Customer Name:** Mr Chris Dackham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02485/1/001  
**Customer Name:** Ms Zoe Dackham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02486/1/001  
**Customer Name:** Leonie Dackham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02492/1/001  
**Customer Name:** Ms Jennifer Higgins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02500/1/001  
**Customer Name:** Mr Kevin Lawrance

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02504/1/001  
**Customer Name:** Mr Rick Erickson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02528/1/001  
**Customer Name:** Ms Rachel King

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02531/1/001  
**Customer Name:** Mr Carl Hoddinott

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02532/1/001  
**Customer Name:** Mr Anthony Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02541/1/001  
**Customer Name:** Mr Mark Hamilton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02544/1/001  
**Customer Name:** Mr Peter Cameron

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02552/1/001  
**Customer Name:** Ms Claire Chandler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02553/1/001  
**Customer Name:** Mr Mark Wilkinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02556/1/001  
**Customer Name:** Ms Catherine Latham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02557/1/001

**Customer Name:** Ms Christine Murphy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02560/1/001  
**Customer Name:** Mr Patrick Lonergan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02561/1/001  
**Customer Name:** Ms Sarah Duncan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02564/1/001  
**Customer Name:** Ms Tania Swarbrigg

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02566/1/001  
**Customer Name:** Ms Juliet Dunsmuir

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02569/1/001  
**Customer Name:** Ms Ailsa Masters

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02427/1/001  
**Customer Name:** Mr Martin Goodman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02431/1/001  
**Customer Name:** Mr Nigel Heugh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02433/1/001  
**Customer Name:** Ms Judyth Martin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02438/1/001  
**Customer Name:** Mr Simon Barber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00643/1/001  
**Customer Name:** Mrs Heather Fraser

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02549/1/001  
**Customer Name:** Mr Martin Doyle

**Summary of representation:**

Support the proposal for 1024 dwellings at Martyrs Lane but excluding the New Zealand Golf Club land.

Particularly upset that WBC have confused the issue of the land needed for safeguarding with the issue of re-drawing the Green Belt boundary. This has led to an unnecessary upset to residents in the Woodham Lane area, who have been falsely led to believe that the land on the New Zealand Golf Course is under immediate threat.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The top part of the site was recently granted planning permission.

Much of the northern site has already been used for non-agricultural purposes and has been used for development previously. This includes disused sports facilities, debris and buildings.

Part of the northern site is publicly owned so the sale would help council tax payers.

There is currently no public access to the land.

The northern part of the site is close to major local employers.

The northern part of the site is well served with public transport unlike the other six sites.

The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre.

Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites.

Reasons against development in Pyrford include:

Pyrford has a unique semi rural setting with open views set on an escarpment. The fields are used for agricultural purposes.

The Peter Brett Woking Green Belt report stated that two fields in Parcel 9 have very low suitability for removal from the green belt, with low, or little or no, capacity for change in landscape character.

The Green Belt land in Pyrford is very accessible and used for recreational purposes.

The infrastructure in Pyrford is at capacity.

The B367 is narrow and suffers with congestion. Additional traffic will make the situation worse.

The public transport in Pyrford is limited and a major improvement will be required to reduce private vehicle road usage.

Sewerage capacity is already at maximum, with overflows occurring during heavy rains. Only a major capacity upgrade between Pyrford and the Wisley plant would enable a large new development to be practicable.

The Pyrford Primary School is at capacity and there is no intention for it to expand.

## Officer Response:

Support for the Martyrs Lane proposal and objection to development in Pyrford is noted.

To clarify on the representation regarding the proposed Green Belt boundary, the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site

Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst there may be limited public access to much of the Martyrs Lane site, one of the overriding considerations is to ensure that any land removed from the Green Belt will not undermine its overall purpose and integrity.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking

Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal

of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The representation regarding outlining other reasons against development in Pyrford have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02550/1/001

**Customer Name:** Ms Ann Stone

**Summary of representation:**

Support for the Martyrs Lane proposal.

It appears misinformation has been circulated about the Martyrs Lane (ML) site as to the number of dwellings needed which needs to be corrected. Up to 1,200 homes could be provided on part of this site – as opposed to the 3,000 over the total site that has been publicised.

The ML site, whilst currently classified as Green Belt, is well contained by existing urban and natural boundaries including the A320, the existing urban area and the Bourne Stream. The A320 is also far better able to cope with traffic volumes than the B roads and country lanes at the other proposed sites.

Planning permission to develop part of the site was granted in 2012.

The top part of this site includes pre-developed land which is now semi derelict.

There is no current public access to the site, unlike the other proposed sites.

The site has no local or national landscape designations unlike the proposed Mayford or Pyrford sites.

The Green Belt boundary review describes the site as low in suitability for development whereas again Mayford and Pyrford are classed as very low in suitability.

Council personnel acknowledged in 2015 that development at the site would merely impact on the landscape. By contrast they assessed the impact at all three of the alternative sites (Byfleet, Mayford and Pyrford) as very negative.

A most important advantage of the ML site is the possibility that more affordable housing could be incorporated into the project due to the land being less costly than the other sites.

The site is in close proximity to employment

There is viable public transport unlike the other sites.

There are economies of scale from using one large site.

There will be less traffic congestion plus better safety and access during construction and when completed.

There is direct access from the A320 to Woking town centre and the M25.

Potential for superior infrastructure.

Part of the north of the site is publicly owned so the sale would benefit council tax payers

Significantly fewer residents would be affected by a single site development

It is not necessary to include the New Zealand Golf Course in the development.

**Officer Response:**

Support for the Martyrs Lane site is noted.

As set out in the Land to the east of Martyrs Lane consultation paper, the Council was consulting on the possibility of substituting the site for the sites safeguarded in the draft Site Allocations DPD to meet long term development needs. In particular, the consultation document stated that it is anticipated that the site is sufficient to enable the delivery of at least 1200 net additional homes. This is broadly similar to the cumulative yield of the six original sites.

Whilst the site benefits from a number of existing boundaries, as set out in the representation, it should be noted that the site was not recommended for removal from the Green Belt in the Green Belt boundary review. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The Landscape Assessment and Green Belt Review (2016) also noted that the site is of critical importance to the purpose of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The site is also of critical importance to the landscape character of the wider area. A Significant change to the character of the site, as well as substantial vegetation losses would need to occur in order to accommodate the dwelling numbers currently envisaged to meet Woking's assessed housing need. These factors will weigh in the balance of considerations by Members when identifying the Council's preferred safeguarding approach.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose

and integrity. It should also be noted that only some of the original six sites have public access. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the

A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

Regarding the representation on infrastructure provision and economies of scale, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. However it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 02563/1/001  
**Customer Name:** Ms Susan Keale

**Summary of representation:**

The two fields either side of Upshot Lane are integral to the heritage setting of the area, are used for agricultural purposes and make an important contribution to the rural character of the area. They also have amenity value.

The loss of these Pyrford sites would not create a long term solution to the housing needs and will only create more problems in the future. The local infrastructure is at capacity already.

The loss of the Green Belt anywhere should not even be a consideration so with this in mind I agree to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

The site is previously developed including several disused buildings and was granted planning permission for McLaren. It has much less amenity and heritage value.

A single site would be less disruptive and be more economical.

The Sheer House proposal in West Byfleet should be used against the 1024 dwellings required and therefore the New Zealand Golf course should not be considered for development.

**Officer Response:**

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using

its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on proposed housing developments in West Byfleet, it should be noted that the Council is seeking to safeguard land for future development needs between 2027 and 2040. The proposed development within West Byfleet, as set out in the representation, will if permitted and delivered, make a contribution towards the housing requirement of the Core Strategy which is for 4964 dwellings between 2010 and 2027. It therefore can not be used to reduce the housing requirements for the next plan period.

**Contributor Reference:** 02567/1/001  
**Customer Name:** Mr Phil Coleman

### **Summary of representation:**

All of the seven sites under consideration are within the Green Belt, but favour substituting the six sites – totalling 1024 dwellings – with the land to the East of Martyrs Lane, but not including building on the New Zealand Golf Course.

Martyrs Lane is either previously developed or permission granted for development. Part of the site is public land and sale of it would provide funds to the local council which could be used to help fund other services that benefit the residents in the new properties and those in the surrounding area.

There is enough land to not need to develop the New Zealand Golf Course or the land behind Woodham Road.

The proximity of the site to the A320 means it is better situated to allow access for the lorries that will be required for the building and construction work without having to pass by areas containing schools and avoiding going through the town centre.

Recent works to upgrade the water supply along the A320 would provide an easier means of connecting new properties to the mains supply along with other utilities. Other areas would require expensive and disruptive work to provide connection. A single site enables all the required services and utilities to be more easily provided for and doctors and other amenities could be located in a central area that best serves new residents.

The site offers good access to the A320 and major roads such as the M25 and Woking town centre. There are better designed with footpaths and cycle lanes already in place with adequate street lighting. Other areas have narrow lanes with little or no foot paths or street lighting.

The Martyrs Lane site also places it closer to a number of major employers.

The Martyrs Lane site is the most suitable and cost effective option and will have the least impact and disruption.

### **Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste

safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet and West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02568/1/001  
**Customer Name:** Mr Jonathan Hastings

### **Summary of representation:**

Martyrs Lane is more favourable compared to the other six sites. It is just off the A320 which is a main road to the M25. This will also simplify the logistics for any building work on the site.

The Upshot Lane sites are used for agriculture and in the Green Belt.

Martyrs Lane makes logical sense.

### **Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation outlining the logistical benefits of Martyrs Lane is noted. However it should be noted that the purpose of the consultation is to inform the Council's decision on its preferred safeguarding option and the overriding consideration is to ensure that the most sustainable location for future development is selected when compared against all other reasonable alternatives.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. It should also be noted that the majority of the other six sites are not used for agricultural purposes. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

To clarify, all of the proposed safeguarding options are located on sites that are currently within the Green Belt. This includes the land to the east of Martyrs Lane as well as the original six sites identified for safeguarding in the draft Site Allocations DPD. Although the Martyrs Lane site contains some existing buildings and structures, including sports facilities, agricultural buildings and residential properties, the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites.

**Contributor Reference:** 02481 / 1 / 001  
**Customer Name:** Runnymede Borough Council

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 02554/1/001  
**Customer Name:** Ms Nicola Wilkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00244/2/001  
**Customer Name:** Ms Jill Wakefield

**Summary of representation:**

The site is not suitable for a village as it is close to Ottershaw and New haw.

Horsell Common is not available for building.

**Officer Response:**

The representation regarding the sites proximity to New Haw and Ottershaw has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper. In particular, the Council's Landscape Assessment and Green Belt review (2016) by Hankinson Duckett Associates considered the distance between the site and neighbouring settlements. The report concluded that the land to the east of Martyrs Lane is of critical importance to the purposes of Green Belt and that the land prevents urban sprawl and prevents towns merging. However it does also note that the Bourne River and associated flood zones to the north of the site act as a very strong durable boundary in preventing encroachment beyond that point.

The site boundary of the land to the east of Martyrs Lane is clearly set out in the consultation paper. To clarify, the area of land subject to the consultation does not include Horsell Common. Although it is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common, the Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 02559/1/001  
**Customer Name:** Ms Claire Ritchie

**Summary of representation:**

Green Belt land should only be used in exception circumstances and this site does not fulfil this requirement.

Development would have a significant adverse impact on the area and wildlife.

The infrastructure would not be able to cope with proposed development. The road network is already at capacity and congested and development will have a negative impact on current residents.

Local medical facilities are already at capacity such as dentists, schools, doctors and hospitals. Further development will make the situation worse.

The site is not a sustainable or viable option for housing development.

**Officer Response:**

As set out in the Regulation 18 consultation Issues and Matters Topic Paper, in the opinion of the Council the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. The overriding consideration for this consultation is to identify the most sustainable location for future development when compared against all other reasonable alternatives.

Most of the housing need for the borough is internally generated and it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. The Council has a number of planning policies in place to make sure that development is of high standards and sympathetic to the general character of the area. By supporting development with adequate infrastructure, this will help to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Overall the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

Regarding the representation on wildlife, the Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

The Council accepts that it has not carried out a detailed ecological assessment of the site, and recognises the importance for doing so. However, the appropriate time to undertake such a

study would be at the development management stage. The land will only be released for development as part of the review of the Core Strategy and or the Site Allocations DPD, and that will be the most appropriate time to set out the key requirements for any development to be acceptable.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02497/1/001

**Customer Name:** Pyrford Green Belt Action Group

**Summary of representation:**

Objects to development at Pyrford and supports the proposal for development at Martyrs Lane for future development needs. All Green Belt should be protected.

Martyrs Lane and the other six sites are not the only options and the Council has presented an invalid and socially divisive proposition. The consultation does not create a strong community spirit as set out as one of the aims of the Core Strategy.

None of the six sites are safeguarded and therefore the consultation question is inaccurate.

Housing development in the Green Belt contradicts the Spatial Vision and objectives of the Core Strategy. Objects to the principle of Green Belt development as Green Belt is a finite resource and contradicts the Government's commitment to protect it, which is reaffirmed in the Housing White Paper. Urge Woking Borough Council to halt dismantling the Green Belt.

All brownfield land should be allocated first and Woking Council does not yet have a Brownfield Register in place.

Housing numbers in Woking should be reviewed as the existing infrastructure can not cope and the provision and location of new supporting facilities is unplanned. Green field sites are now being considered for development and this contradicts Policy CS6 as well as the Council's Vision for 2050 and the Natural Woking Strategy.

Object to development proposals on floodplains.

Calls on the Council to abandon the policy of safeguarding land for future development needs as it is an unsatisfactory method of choosing the future direction of development in the Borough. If the Martyrs Lane proposal can be considered at the last minute then this could repeatedly happen and the Green Belt will continue to be eroded. The Safeguarding process allows developers to choose land for themselves without the agreement of local communities.

The Council has identified land to deliver at least 900 dwellings in the plan period which is well in excess of the 550 homes in the Core Strategy, The intention to remove land for a further 1000 homes can not be justified.

Object to development proposals in Pyrford for the following reasons.

The sites have been selected based on a faulty process. Repeats paragraph 83 of the NPPF. The decision is based on inadequate evidence and can not be justified.

The Green Belt boundary review stated that GB12 serves two critical Green Belt purposes; restricting urban sprawl and safeguarding the countryside from encroachment.

The site was assessed to be only the 18th of 31 sites in terms of sustainability. It is not near a town centre, secondary school or GP and public transport is limited.

Availability of land has been given great weight in the Green Belt review methodology. It is not a relevant consideration when selecting sites for safeguarding beyond the plan period.

GB13 selection is not rationalised or transparent. It was not supported in the Green Belt boundary review.

The sustainability appraisal scores the two fields as a double negative for the impact development would have on natural, historic and cultural assets, and landscape. The Green Belt Review correctly stated there to be a Major environmental constraint to developing both fields. The fields were assessed as ranging from having a strong unspoilt rural character to a predominantly intact rural character having little or no capacity for change. The rural character of the area is valued by residents and visitors alike.

Both Pyrford fields are in an environmentally sensitive area with the sites containing a wide range of biodiversity features.

The area is on the escarpment and protected by Core Strategy Policy CS24. The Surrey Landscape Character Assessment notes the rural feel to the area and that the fields provide an important setting for the extensive heritage assets of the area.

The footpaths and bridleways are of special importance and used for recreational purposes. This is supported by the Natural Woking Strategy regarding green infrastructure.

The Government Housing White Paper recommends higher density building. This is inappropriate in Pyrford, an area surrounded by Conservation Areas. The genuine need for smaller properties would be better met elsewhere. Prospective developers of the Pyrford fields would most likely wish to build large executive homes which would not satisfy the need for genuinely affordable housing.

Pyrford Neighbourhood Plan has not allocated housing on the Green Belt in the Forum area; this is because there is a clear wish by the community to keep the fields in the Green Belt.

Two petitions in the area highlight that there is local objection to development in this area. The Council has not listened to the views of the community. Almost all of the representation received as part of the Regulation 18 consultation were dismissed.

As per paragraph 84 of the NPPF, local planning authorities should take into account promoting sustainable patterns of development. Changes to the road network in Pyrford would

harm the character of the area and the existing roads are congested. There is a significant amount of development taking place in this area.

Additional traffic will also increase noise and air pollution which is damaging to people and wildlife, this is not sustainable development. No attention has been paid to cycle routes or safety.

The existing healthcare facilities are not within Pyrford and it is unclear whether they can support additional patients.

The Pyrford school is over subscribed. The framework for securing the necessary infrastructure to support development is severely compromised.

The NPPF states that agricultural land should be taken into account. English Nature have stated that the Pyrford fields have not been examined to determine their agricultural grade and the Green Belt boundary review states that Agricultural Land Classification is not a major constraint at this stage. It is wrong to remove these sites from the Green Belt without knowing the status of this land.

#### **Officer Response:**

Objection to the principle of Green Belt development and in particular the safeguarding of land in Pyrford for future development needs is noted.

Support for the Martyrs Lane proposal is also noted.

Whilst some of the land within the Martyrs Lane site contains existing structures and buildings, the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites.

As part of the Site Allocations DPD process the Council has considered about 125 sites in total. These sites were all individually assessed prior to the publication of the draft Site Allocations DPD as part of the Sustainability Appraisal (SA) Report. At the Regulation 18 stage, the Council highlighted that the consultation presented an opportunity to submit new sites for consideration as well as further evidence to support sites previously considered by the Council. A number of new sites were submitted to the Council at this stage and they were all assessed against the same sustainability criteria set out in the SA. The Officer's Report to the LDF Working Group on the 1st July 2016 sets out why these additional sites were supported or rejected.

The Council has also now carried out an additional public consultation exercise on the possibility of substituting the six original sites identified for safeguarding in the draft Site Allocations DPD for the land to the east of Martyrs Lane.

Based on the above, the Council has considered a number of sites across the borough and has considered the merits of these sites through a consistent methodology. This is all available on the Council's website.

It is not considered that the Martyrs Lane consultation is socially divisive or conflicts with the aims of the Core Strategy. The purpose of the consultation is quite clear; it is to gather evidence from stakeholders and the public to inform the Council's decision on its preferred safeguarding option. By allocating specific sites for development, in both the Green Belt and urban areas, this will also help to deliver one of the other aims of the Core Strategy which is to 'give local people and key workers access to good quality and affordable housing'.

The preparation of the Site Allocations DPD is the formal process that will ultimately confirm the status of each of the sites designated within it, including those that are earmarked for safeguarding. The sites that have been identified in the Regulation 18 version are those that the Council had proposed for the purposes of safeguarding if it is examined and approved. The Land to the east of Martyrs Lane Consultation Document is careful to use the term 'proposed sites' and the introduction to the draft Site Allocations DPD also makes it clear that the sites are proposed at this stage.

The Council published the draft Site Allocations DPD for public consultation between 18th June and 31st July 2015. The publication of the draft document was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document clearly identified a number of sites that would be safeguarded for future development needs between 2027 and 2040. To clarify, the draft Site Allocations DPD safeguarded the following sites for future development needs:

GB4: Land south of High Road, Byfleet

GB5: Land to the south of Murray's Lane, Byfleet

GB9: Woking Garden Centre, Egley Road, Mayford

GB10: Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford

GB11: Land to the north west of Saunders Lane, Mayford

GB12: Land rear of 79–95 Lovelace Drive, Teggs Lane, Pyrford

GB13: Land east of Upshot Lane and south of Aviary Road, Pyrford

As well as clearly identifying specific sites for safeguarding, Paragraph 216 of the National Planning Policy Framework (NPPF) states that at this stage of the process, the document can be afforded very limited weight in the determination of planning applications. Therefore despite not being an adopted Council document, it does form part of the emerging Development Plan for Woking Borough.

Based on the above, whilst the Site Allocations DPD has not been adopted by the Council at this stage it is clear that the formal plan making process has started and that the Martyrs Lane consultation document was correct in identifying the original sites as 'safeguarded sites in the draft Site Allocations DPD'.

The requirement to safeguard land for future development needs as part of the plan-making process is set out in paragraph 85 of the NPPF, in particular bullet points 3, 4 and 5. As set out in the draft Site Allocations DPD, the land to the east of Martyrs Lane consultation paper and the Regulation 18 consultation Issues and Matters Topic Paper, the Council is seeking to establish the principle of safeguarded land to ensure the development plan is in general conformity with the requirements of the NPPF. The release of these proposed safeguarded sites for development will only be considered following a review of the Core Strategy and or the Site Allocations DPD. The Council has also sought legal opinion on the requirement to safeguard land for future development needs. The legal opinion, as set out in the Minutes to the LDF Working Group (1st July 2016), stated that 'It has been suggested that the Council does not need, either through the Green Belt boundary review or the draft Site Allocations DPD, to identify land or sites to meet the projected housing need for the period 2027 to 2040. However, I consider that, hitherto, the Council has clearly adopted the right approach and would be committing a justiciable error if it proceeded otherwise'. It concluded by stating that 'The Council has adopted the correct approach in seeking, through the Green Belt boundary review and the Site Allocations DPD to identify land or sites to meet the projected housing need for the Borough in the period between 2027 and 2040'. The Council therefore considers the Site Allocations DPD, and in particular the safeguarding of land for future development needs between 2027 and 2040, to be consistent with national planning policy.

As set out in the Council's Regulation 18 consultation Issues and Matters Topic Paper, the Core Strategy Examination Inspector not only recommended the release of Green Belt land for housing development, but also was prescriptive about its process and timing. The Core Strategy, which is an adopted Council document and forms part of the Development Plan for the borough, commits the Council to prepare a Site Allocations DPD to release Green Belt land for development.

Whilst the Housing White Paper reconfirms the government's commitment to protecting Green Belt land, the White Paper does not propose any material change in national Green Belt policy. The Core Strategy was prepared and found sound in the context of the NPPF and in particular the Green Belt policies within it.

As set out in the draft Site Allocations DPD, the Council proposed to allocate 52 sites within the existing urban areas for a range of development uses. The spatial distribution of these sites highlights that the majority of the sites fall within Woking town centre where high density mixed use development is encouraged, as set out in Core Strategy Policy CS1 and CS2.

Core Strategy Policy CS6: Green Belt states that the Green Belt has been identified as a direction of growth between 2022 and 2027. At the examination of the Core Strategy the Council was able to successfully demonstrate to the inspector that from 2022, it would be unable to identify enough land in the existing urban areas to meet its housing needs. The Core Strategy is therefore prioritising development within the existing urban areas (previously developed land) before releasing land in the Green Belt towards the end of the plan period.

As stated in The Town and Country Planning (Brownfield Land Register) Regulations 2017 (3) (2), 'Each local planning authority must publish their register by 31st December 2017'. Whilst the Council accepts that it has not to date published its Brownfield Register, it intends to do so in accordance with the regulations.

The representation regarding examining all other reasonable options for meeting housing needs has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

The Site Allocations DPD is not an opportunity to review the Council's housing requirements, as suggested in the representation. The Site Allocations DPD has a very clear and specific aim of identifying sites that will facilitate the comprehensive delivery of the Core Strategy. A review of the Council's housing requirements will only be considered at a review of the Core Strategy. For information, the Council's Strategic Housing Market Assessment (2015) (SHMA) shows that the borough's housing need is far in excess of the annual housing requirement of the Core Strategy at 517 dwellings per annum.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Whilst the Site Allocations DPD seeks to remove around 3.5% of the Green Belt for development needs up to 2040, it is important that the sites identified are the most sustainable when compared to all reasonable alternatives and they do not undermine the overall purpose and integrity of the Green Belt.

The Council has addressed the representation on flooding in the Regulation 18 consultation Issues and Matters Topic Paper. In short, none of the six original proposed safeguarded sites are within Flood Zone 2 or 3. At the Martyrs Lane site, although containing some areas of Flood Zone 2 and 3, development would be directed to the 91.5% of the site that falls within Flood Zone 1.

Safeguarding land for future development needs does not allow developers to choose land for development without the agreement of the local community. Safeguarded land will only be released for development following a review of the Core Strategy and or the Site Allocations DPD. In respect of the Pyrford sites, at this stage the Site Allocations DPD only seeks to safeguard land. It also does not remove the requirement to obtain planning permission as part of the development management process. In terms of community engagement in the process, the Council has a Statement of Community Involvement which sets out how the community is able to engage in the planning process and what the Council will do to raise awareness of planning consultations.

It is considered that the procedural matters of the Site Allocations DPD process is consistent with planning regulations and all legal requirements. These matters of procedure will be considered by an independent inspector at the examination of the DPD as part of the Test of Soundness.

As set out in paragraph 83 of the NPPF, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The case for exceptional circumstances is set out above as well as in the Regulation 18 consultation Issues and Matters Topic Paper. It should be noted that the Site Allocations DPD will form part of the Development Plan for Woking Borough and will facilitate the delivery of the Core Strategy. By reviewing and altering the Green Belt boundary as part of this plan-making process, the Council is following the requirements of paragraph 83 of the NPPF.

The representation regarding inadequate evidence has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

As set out in table 3.2 of the Green Belt boundary review, all parcels of land except for parcels 3,5,6 and 29 of are significant, major or moderate importance to the purposes of Green Belt to some degree. The conclusions of the Green Belt boundary review state that 'the landscape assessment notes that this site (GB12) is more discrete, partly contained by trees and set beyond the prominent slopes to the east. The site is therefore under consideration for release from the Green Belt'. The Council's SA Report as well as the Regulation 18 version of the Site Allocations DPD set out specific design and mitigation measures to ensure that development can be suitably accommodated on the site.

Regarding accessibility to services and facilities, it is correct that GB12 and GB13 are not within reasonable walking distance of Woking town centre or an existing secondary school. Nevertheless they are within a reasonable walking and cycling distance of Pyrford Neighbourhood Centre which meets the day to day needs of local residents. They also benefit from a limited public transport service. The Council recognises that regardless of what sites are safeguarded for future development needs, it will be necessary to work with bus service providers to improve service provision and frequency.

The representation on the Green Belt boundary review methodology has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding the representation on the land availability, availability of land is a significant material consideration for the Council to take into account in deciding its preferred approach to safeguarding for the purposes of the Regulation 19 consultation. Paragraph 182 of the NPPF deals with examination of local plans and it requires the Council to only submit a plan for examination which it considers sound. Amongst other things, to be sound, the plan:

- o Should be deliverable over its period;
- o Should be the most appropriate strategy when compared against the reasonable alternatives, based on proportionate evidence.

Footnote 11 of the NPPF provides clarity on what a deliverable site is. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Whilst five years is emphasised in the footnote, its relevance should be seen in the context of the details of the representations received from the owners of all seven proposed safeguarded sites at both the Regulation 18 stage and Martyrs Lane consultation.

As part of the Site Allocations DPD process, the Council has written to landowners of all of the sites in the DPD, to confirm the deliverability of the sites included within it. As set out in the draft document, the six proposed Regulation 18 safeguarded sites are considered to be deliverable based on the information submitted by the landowners. As part of the Martyrs Lane consultation, the Council has written to the various landowners within the site boundary. For information, the New Zealand Golf Course and McLaren Technologies Limited have confirmed that the land in their respective ownership will not be made available for residential development. It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the Martyrs Lane site is the most sustainable when compared with the original six safeguarded sites.

The decision to safeguard the land in the draft Site Allocations DPD is well evidenced and the full list of evidence documents is set out in the draft Site Allocations DPD as well as on the Council's website. This is also set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The reasons why the sites scored a double negative for conserving and enhancing the natural, historic and cultural assets and landscapes of Woking are clearly set out in the SA. The SA however identifies that the impacts could be mitigated by detailed site layout and design to retain as much openness as possible and landscape buffers to reduce the visual impact of development. For GB12 in particular, this is similar to the recommendations set out in the Green Belt boundary review.

The Surrey Landscape Character Assessment defines the landscape character of the wider Surrey area and provides a detailed assessment of the land to the south-east of Woking (parcel SS10: Woking to Byfleet Settled and Wooded Sandy Farmland) which includes both GB12 and

GB13. It does not specifically assess these two sites as the assessment is a strategic one and not site specific. Nevertheless the Evaluation and Guidance of parcel SS10 makes recommendations of how development could be appropriately accommodated within the assessment parcel. Based on this information, the Council is satisfied that development can be achieved within sites GB12 and GB13 without creating a significant adverse impact on the landscape character of the wider area as well as the specific heritage and landscape designations on and in close proximity to the sites.

Regarding the representation on biodiversity, the Council has consulted with the relevant statutory and non-statutory consultees on this matter and their representations have been taken into account in preparing the Site Allocations DPD. The Council is committed to working with these consultees during the plan making process and beyond to ensure that any of the sites allocated or safeguarded for development do not have a significant harmful impact on biodiversity that can not be mitigated.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The public rights of way in the area are noted and are specifically referred to in the key requirements set out in the proposed safeguarding allocation. Although the public rights of way provide amenity and recreation value, the overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives. Any existing public rights of way on or adjacent to any of the proposed sites would be considered at the development management stage in detail.

Regarding the Housing White Paper: Fixing Our Broken Housing Market, the White Paper sets out a number of proposed amendments to the NPPF in paragraph 1.53. The first proposed amendment seeks to increase housing density where there is a shortage of land for meeting identified housing need and the second proposed amendment seeks to increase residential density in urban locations that are well served by public transport. However it should be noted that the third proposed amendment set out in the White Paper seeks to ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs. This is broadly consistent with the policies of the Core Strategy and the Development Management Policies DPD as well as the design principles set out in the Woking Design Supplementary Planning Document (SPD). Therefore development of any of the proposed Green Belt sites, including those proposed to be allocated for safeguarding, should be designed to the highest design standards and ensure that housing density does not affect the quality and character of an area and the general well-being of residents.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Whilst the Pyrford Neighbourhood Development Plan is now adopted and part of the development plan for the neighbourhood area, it should be highlighted that the plan is in general conformity with the strategic policies of the area. In this case, the neighbourhood development plan is in general conformity with the Core Strategy and emerging Site Allocations DPD. As set out in Planning Practice Guidance neighbourhood plans should make sure the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans are not a tool to prevent development and this is clear in the neighbourhood planning regulations.

The public consultations carried out by the Council on the Site Allocations DPD, namely the Regulation 18 consultation and the Land to the east of Martyrs Lane consultation, have provided local communities with the opportunity to engage in the plan making process. They will have further opportunities to engage in the process during the Regulation 19 consultation and at the Examination.

The petition against development in Pyrford has been considered by the Council at its meeting on the 20th October 2016. The Minutes of the meeting and the Council's response are available on the Council's website. It is therefore incorrect to suggest that the petition has not considered by the Council.

The Council has responded to each of the representations made during the Regulation 18 consultation and taken them into account. The Council's response to each of the 32,712 separate representations can be found online. The Council also prepared an Issues and Matters Topic Paper outlining the Council's response to a number of similar concerns that were raised by the public and other stakeholders. Although the majority of representations did not result in any proposed modifications to the document, the comments were carefully considered and addressed. The fact that a representation did not result in any modifications does not mean that it was not considered.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

As set out in the list of transport evidence base documents above, the Council has carried out an assessment of the development impacts of the Site Allocations DPD in combination with the development proposals within the wider area. This study is on the Council's website.

The environmental implications of development, regardless of whether it is in Pырford or elsewhere, will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

Public transport services and infrastructure currently serving the vicinity of the both the Martyrs Lane and the other six sites are relatively limited. The Council recognises that regardless of what sites are safeguarded for future development needs, it will be necessary to work with bus service providers to improve service provision and frequency.

The representation regarding cycle routes and safety are noted and will be drawn to the County Council's attention. Nevertheless any existing cycle routes, including their provision, quality and connectivity, will be considered in detail at the development management stage regardless of what sites the Council decides to allocate in the Site Allocations DPD. This applies to both urban area and Green Belt sites.

In addition to the infrastructure response above, the Council is working with the Clinical Commissioning Groups (CCGs) to identify healthcare provision and distribution across the borough to ensure that provision supports planned development.

The representation regarding education provision has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

The Council considers that based on the evidence used to inform the Core Strategy that planned development in the borough can be supported by adequate infrastructure provision. The Council is currently updating its Infrastructure Delivery Plan to reflect any further infrastructure requirements and this will be published prior to the Examination of the Site Allocations DPD. The Council, as part of this update and as part of the Site Allocations DPD process, is continuing to work with the relevant infrastructure providers and operators to mitigate any future development impacts.

Regarding agricultural land classification, as part of the preparation of the Site Allocations DPD process, the Council has undertaken a review of agricultural land quality within the borough. This has included reviewing the Agricultural Land Classification Database as shown on the DEFRA website. This database is produced and maintained by Natural England. None of the proposed allocated or safeguarded sites are located on land designated as high quality agricultural land.

In addition, the Council has consulted with Natural England as part of the Site Allocations DPD process. Natural England has not raised any objections regarding the agricultural quality of any of the sites identified for release from the Green Belt for development needs. Natural England's representation to the Regulation 18 consultation and Land to the east of Martyrs Lane

consultation are available to view on the Council's website. The representation also makes reference to the Green Belt boundary review regarding this matter. The report states that for Parcel 9, the agricultural land classification for the land adjacent to the urban areas is classified as 'urban' which is consistent with the Regional Agricultural Land Classification Maps produced by Natural England.

**Contributor Reference:** 02502/1/001  
**Customer Name:** Giles Allington

**Summary of representation:**

Supports the Martyrs Lane proposal.

The Martyrs Lane site will have the least impact on the natural environment and prevents the loss of pristine agricultural land. It will also affect fewer residents quality of life and has better road access and utility provision.

More housing is required in the borough and this should be achieved with the least impact on the natural environment and local character. This can be achieved by using this low grade and partially derelict land.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

During the preparation of the draft Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the original six sites. Overall the preferred sites did not raise any objection from these organisations based on existing biodiversity features. The Council has consulted these organisations as part of the Martyrs Lane consultation and will respond to their representations separately.

Regardless of whether the Council safeguards Martyrs Lane or the six original sites for future development needs, the Council is committed to conserving and protecting existing biodiversity assets within the borough. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. These policies would apply to development at any of the proposed sites.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The social and environmental implications of development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require

development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage regardless of the Council's preferred safeguarding option.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding utility provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02503/1/001  
**Customer Name:** Mr Ian Lamaison

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site and part of it is pre-developed land and now semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers.

Fewer residents would be impacted with one site in the northern part than by six individual sites.

The northern part of the site is well served with public transport unlike the other six sites and has access on to the A320 towards Woking town centre and the M25.

The land is a single site, has been previously developed, is partially derelict and less than half is necessary to meet Borough requirements.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without

the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02506/1/001  
**Customer Name:** Mr Alexander Ritchie

**Summary of representation:**

Road network cannot cope with proposed increased amount of housing.

There is already difficulty with current local services.

Green Belt should not be used before exhausting all brownfield options.

Development would result in the loss of the historic New Zealand Golf Course.

**Officer Response:**

The representation regarding road infrastructure and wider infrastructure provision such as medical facilities, has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

The Council has comprehensively assessed brownfield sites as part of the evidence to inform the Site Allocations DPD. As part of this exercise, it has carried out and published a Sustainability Appraisal (SA) that assesses all reasonable alternative brownfield sites in a consistent manner against a set of sustainability objectives, including environmental, social and economic objectives. The SA and the full list of other evidence base documents can be found on the Council's website. More information can also be found in the Regulation 18 consultation Issues and Matters Topic Paper.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. This may include the development of the New Zealand Golf Course. However it should be noted that the Zealand Golf Course has confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes.

**Contributor Reference:** 00650/2/001  
**Customer Name:** Robin I Morgan

**Summary of representation:**

Objects to the proposed development of land adjacent to Martyrs Lane. The earlier proposals for smaller development around the borough were a better solution to the requirement to provide additional housing. Martyrs Lane is in an unsuitable location. I do not see that the new scheme has any benefits over the earlier proposals.

Objects to the loss of Green Belt. The McLaren planning permission, although a loss of Green Belt land, was justified by economic reasons. There is no similar justification for this proposal. Green Belt land should be protected from development as stated in Green Belt policy.

The proximity of the proposed development of Fair Oaks airport will create urban sprawl.

Woking Borough Council prides itself on its care for the environment. If this plan goes ahead, the council and the councillors who voted for it will lose all credibility.

The present road system will be totally inadequate for the traffic which would be produced by the development. The A320 and A245 are at capacity and would need to be significantly widened to cope with future traffic flows, leading to the loss of considerable amenity to the borough. The site would not be able to form a new northern access point other than by a new road link to St Peter's Way.

It is a better solution to develop the land between St Peter's Way, the M25, the A320, Murray Road and Spinney Hill. This would have the great advantage of having direct access to the M25 and easy access to Addlestone and Chertsey Stations.

The Martyrs Lane proposal will simply increase rush hour congestion at Woking Station where access from the north is totally inadequate.

I agree with those who object on infrastructure, wildlife, woodlands and the recycling centre grounds.

The proposal seems to be unconsidered and impractical.

**Officer Response:**

Objection to the Martyrs Lane proposal and support for the previous safeguarding strategy is noted.

The representation regarding the principle of Green Belt development, the McLaren planning permission and urban sprawl have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

Regarding the representation on the environment, as part of the preparation of the Site Allocations DPD the Council has undertaken a Sustainability Appraisal (SA) which provides a consistent approach to describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. This includes an assessment of the effects of development on the natural environment. The SA Report is on the Council's website. The overriding consideration of this particular consultation is to inform the Council's decision on its preferred safeguarding option and to ensure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

Although the Council notes the suggestion to develop land near St Peters Way/M25/A320/Murray Road/Spinney Hill, it should be noted that this land is outside of Woking Borough and the Council is unable to allocate land for development outside of its administrative boundaries. Nevertheless, the Council is of the opinion that there is suitable land within the Borough that can be developed to meet the Borough's housing requirements without development having a significant adverse impact on the quality of life of residents and the environment.

The representations regarding traffic and road infrastructure, general infrastructure provision, wildlife, woodlands and the Martyrs Lane Recycling Centre have all been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02507/1/001  
**Customer Name:** Ms Helen Morgan

**Summary of representation:**

Objects to the proposed development of land adjacent to Martyrs Lane. The earlier proposals for smaller development around the borough were a better solution to the requirement to provide additional housing. Martyrs Lane is in an unsuitable location. I do not see that the new scheme has any benefits over the earlier proposals.

Objects to the loss of Green Belt. The McLaren planning permission, although a loss of Green Belt land, was justified by economic reasons. There is no similar justification for this proposal. Green Belt land should be protected from development as stated in Green Belt policy.

The proximity of the proposed development of Fair Oaks airport will create urban sprawl.

Woking Borough Council prides itself on its care for the environment. If this plan goes ahead, the council and the councillors who voted for it will lose all credibility.

The present road system will be totally inadequate for the traffic which would be produced by the development. The A320 and A245 are at capacity and would need to be significantly widened to cope with future traffic flows, leading to the loss of considerable amenity to the borough. The site would not be able to form a new northern access point other than by a new road link to St Peter's Way.

It is a better solution to develop the land between St Peter's Way, the M25, the A320, Murray Road and Spinney Hill. This would have the great advantage of having direct access to the M25 and easy access to Addlestone and Chertsey Stations.

The Martyrs Lane proposal will simply increase rush hour congestion at Woking Station where access from the north is totally inadequate.

Local community services such as schools and health centres will be unable to support the development.

I agree with those who object on infrastructure, wildlife, woodlands and the recycling centre grounds.

The proposal seems to be unconsidered and impractical.

**Officer Response:**

Objection to the Martyrs Lane proposal and support for the previous safeguarding strategy is noted.

The representation regarding the principle of Green Belt development, the McLaren planning permission and urban sprawl have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

Regarding the representation on the environment, as part of the preparation of the Site Allocations DPD the Council has undertaken a Sustainability Appraisal (SA) which provides a consistent approach to describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. This includes an assessment of the effects of development on the natural environment. The SA Report is on the Council's website. The overriding consideration of this particular consultation is to inform the Council's decision on its preferred safeguarding option and to ensure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

Although the Council notes the suggestion to develop land near St Peters Way/M25/A320/Murray Road/Spinney Hill, it should be noted that this land is outside of Woking Borough and the Council is unable to allocate land for development outside of its administrative boundaries. Nevertheless, the Council is of the opinion that there is suitable land within the Borough that can be developed to meet the its housing requirements without development having a significant adverse impact on the quality of life of residents and the environment.

The representations regarding traffic and road infrastructure, general infrastructure provision, wildlife, woodlands and the Martyrs Lane Recycling Centre have all been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02508/1/001

**Customer Name:** Akeel Sachak

**Summary of representation:**

Support for the Martyrs Lane proposal.

Much of the Martyrs Lane site has already been used for non-agricultural purposes and is not high value agricultural land

The cost of this land in this area is much lower than in Pyrford providing an opportunity to provide affordable/social housing

A single site would provide economies of scale to address infrastructure issues

The site is well served with public transport unlike all the other six sites

The site has easy access on to the A320 with its direct road links to M25 and to Woking town centre

The site is close to major local employers like St Peter's Hospital and Animal & Plant Health Agency

Part of the site is publicly owned land so the sale would help council tax payers

Fewer Woking residents would be impacted with one site in the northern part of the borough than by six separate sites and the nominated area has a very small number of existing residential properties

Building on the Pyrford Green Belt fields would mean using land that is currently used for agricultural purposes

The Pyrford school is full to capacity while a new development at Martyrs Lane can provide a new school

The West Byfleet Health Centre is operating at maximum capacity. Martyrs Lane offers an opportunity to build a new health centre

The Pyrford/West Byfleet traffic situation is already acute with severe congestion.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and

still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along both the A320 and A245 corridors. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites. It should be highlighted that

the purpose of this consultation is to inform the Council's decision on its preferred safeguarding option to ensure that the most sustainable land is identified to meet its future development needs. It is not to identify land that is isolated and or has few existing neighbouring properties.

**Contributor Reference:** 02509/1/001  
**Customer Name:** Mr Peter Fingland

**Summary of representation:**

The site is under utilised wild land and large enough to accommodate 1024 dwellings.

There are two significant roads adjacent to the site which provide good access. By including the New Zealand Golf Course there is a risk that about 3000 homes could be built which would overload the area. 1024 homes should be the maximum.

Many of the alternative sites proposed are on utilised or farmed land.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02522/1/001  
**Customer Name:** Ms Lucinda Lloyd

**Summary of representation:**

Awful idea. Will result in the loss of Green Belt land and put pressure on local services and infrastructure. It will also involve the loss of wildlife and woodlands.

Oppose the proposal.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation highlighting reasons against development at Martyrs Lane has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02452/1/001  
**Customer Name:** Mrs Sandra Simkin

**Summary of representation:**

Supports the Martyrs Lane proposal as development is not wanted in Mayford.

No Green Belt land should be used for development and the current consultation is putting opposing communities against each other across the borough.

Woking Borough Council wants to remove all Green Belt land and once Martyrs Lane has been developed then there is a precedent for Green Belt development elsewhere.

Land values in Woking are high and so homes should be more affordable. Building on Green Belt results in more profits for developers than those on brownfield sites.

The Council never looks at the 800 empty properties in the borough that could be compulsory purchased and added to the housing stock or used to house people on the housing list.

No one ever challenges the need or number of homes specified, which was established by the Labour Government before 2010.

**Officer Response:**

Support for the Martyrs Lane site and objection to development in Mayford is noted.

Objection to the principle of Green Belt development is also noted. In the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established in the Core Strategy and is consistent with national planning policy. This has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular Section 1.0 and 2.0.

It should be noted that the purpose of the Martyrs Lane consultation is to inform the Council's decision on its preferred safeguarding option. The consultation is an opportunity for the Woking community as well as landowners and stakeholders to provide the Council with useful evidence to inform its decision on the matter. The intention of the consultation is not to put various communities within the borough against each other, as suggested in the representation.

It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the

sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

Whilst it is acknowledged that the Site Allocations DPD proposes to remove Green Belt land for development, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about 3.5% of the total Green Belt. When all of the allocated sites have been developed the Green Belt would be about 61.8% of the total area of the Borough and therefore the amount of land being proposed to be released is relatively modest.

By planning for growth in the borough through the plan led system it will ensure that the Green Belt is protected from speculative development and that an enduring Green Belt boundary will be established.

The Council agrees that affordability is a key issue in the borough, as set out in Core Strategy Policy CS12: Affordable housing. The Council has an affordable housing policy as well as a guidance document (Affordable Housing Delivery SPD) that facilitates the delivery of affordable housing. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability.

As set out in Core Strategy Policy CS12, new residential development on greenfield land will be required to provide more affordable housing than developments on previously developed land.

Regarding the representation on empty homes in the borough, the Council has an Empty Homes Plan 2015–2018 which seeks to minimise the number of empty homes through the Council's intervention and maximise the opportunities for returning empty homes back into use through initiatives and incentives. This is set out in further detail on the Council's website. Whilst empty homes could bring back properties into use, this alone will not meet the identified housing need in the Borough up to 2040.

The Council's housing need is clearly set out in the Strategic Housing Market Assessment (SHMA), which was last updated in 2015 and is available on the Council's website. The SHMA highlights that the actual housing need in the borough is 517 dwellings per year. As set out in Section 1.0 of the Regulation 18 consultation Issues and Matters Topic Paper, taking into account the available evidence including an assessment of various options of housing provision and the requirements of national planning policy (NPPF) as a whole, the Inspector of the Core Strategy examination agreed that the Core Strategy should make provision for an annual average housing requirement of 292 dwellings. This is therefore significantly below the objectively assessed need of 517 dwellings per year. It is therefore incorrect to suggest that the Council's housing need is based on policy requirements from before 2010.

**Contributor Reference:** 02454/1/001  
**Customer Name:** Ms Jane Armitage

**Summary of representation:**

Objects to development in Pyrford and supports the Martyrs Lane proposal.

There are enough brownfield sites that should be used before Green Belt land is used for development.

The Pyrford fields are used for agriculture and should be retained for this purpose. There is much local interest in keeping the site as fields. They could be used for organic / crop rotation farming that could be sold locally.

Martyrs Lane, other than the New Zealand Golf Course, has no current use at all.

The fields form part of the historical, rural landscape of the area as set out in the Pyrford Neighbourhood Plan.

The former Army Camp should be reused for emergency housing for the homeless, low income and key workers. This site is ideal for affordable housing that work at St Peters Hospital. Many workers could cycle to work as there is a cycle route in place already.

The former Army Camp is of local historic interest and could be incorporated into the development of the site, including a village hall. Surrey History Centre can provide more information.

Evidence suggests that Pyrford is one of the best walking areas of the UK. Development would have a negative impact on walkers and the views of the landscape.

Many people use the local footpaths for recreational purposes. The area is a beautiful rural area and recommend that Woking Borough Council visit the footpaths suggested in the representation.

Infrastructure like water, waste, and electricity in Pyrford is already stretched.

Development of several sites will cause traffic disruption to many residents. Pyrford is likely to be affected by development in the area including Wisley Airfield, Broadoaks and Sheer House in West Byfleet. No more development in needed around Pyrford.

Pyrford School causes disruption and is at capacity. A new school could be built at Martyrs Lane.

The West Byfleet Health Centre is at capacity and a new facility could be built at Martyrs Lane.

The local bus service is underused in Pyrford. There will be more of a need for public transport links from Martyrs lane especially if there is more key worker, low income families living at that site. A bus service between the site and Woking town centre would be an asset and reduce air pollution and boost jobs for local people. A route to Woking Station would also boost the area.

The historic woodland around Pyrford Court is important and of local interest.

The flood plain on the Martyrs Lane site should be used as a wetland area to promote biodiversity and general well-being. This will have a positive impact on the NHS. A lake could be formed and used for recreational purposes.

A retirement village can be built on the site and Mayford Grange is a good example in the borough. If the Council reviews the developments carried out by this developer then it will provide ideas on how to solve the housing shortage in the local area.

#### **Officer Response:**

Objection to development in Pyrford and support for the Martyrs Lane site is noted.

The Council has addressed the representation regarding previously developed land in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Section 11.0. It should be noted that overall about 125 alternative sites were appraised by the Council in preparing the draft Site Allocations DPD. This is set out within the Sustainability Appraisal.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst the fields in Pyrford could be used for organic / crop rotation, it should be noted that the land is not owned or managed by the Council and therefore has no influence in what is grown on site.

It is incorrect to suggest that the land within the Martyrs Lane site is unused as the site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of

Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Regarding the representation on using the former Army Camp for residential uses, the Green Belt Boundary Review assessed the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land from the Green Belt would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. This is also supported in the Sustainability Appraisal for the site known as Woodham Court.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity major employers, including St Peters Hospital. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station and some local services and facilities, the northern part of the site is not within reasonable cycling or walking distance of employment areas, railway stations and existing services. There are therefore no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the provision of a village hall, school and health centre, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the

safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding and that any land removed from the Green Belt will not undermine its overall purpose and integrity.

The representation regarding infrastructure in Pyrford has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Section 3.0 which refers to transport and road infrastructure, water and drainage provision and education. It should be noted that the Council has consulted with the relevant utility providers and their representations will be taken into account when preparing the Site Allocations DPD for Regulation 19 consultation.

The Council has also worked with the County Council and the other Surrey authorities to prepare the Cumulative Assessment of Future Development Impacts on the Highway. A Duty to Cooperate Statement will be published to demonstrate the extent of cooperation between the two authorities and with other relevant organisations and neighbouring authorities. The proposals of the DPD are informed by comments from the County Highways Authority and the Council is committed to continue to work positively with them and Highways England throughout the Site Allocations DPD process and beyond to address common and strategic transport issues of the area.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features and trees within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage and landscape assets of the area.

The suggestion for a wetland area and lake are noted. Should the Council decide to safeguard the site for future development needs, then the masterplanning of the site will be considered at the Development Management stage. This would also include some input from relevant stakeholders such as the Environment Agency and Natural England.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

**Contributor Reference:** 02456/1/001  
**Customer Name:** Mr Nigel P Butt

**Summary of representation:**

Martyrs Lane is the only viable development which should be considered.

It is previously developed land, which is largely derelict and does not have a network of footpaths or is it an area of outstanding natural interest or beauty.

Upshot Lane has great beauty, been productively farmed and has a network of footpaths and rights of way.

The Martyrs Lane site was granted planning permission for a McLaren development.

There are three large employers near the Martyrs Lane and they would all benefit from a housing development on the Martyrs Lane site.

The Martyrs Lane are is lowly populated and the infrastructure is more robust to handle increased demand for roads and other facilities.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for

its preferred approach to safeguarding. It should also be noted that the majority of the six original sites do not contain public footpaths.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

The Green Belt boundary review assessed the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a

single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding the impact of development on the existing community is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02458/1/001

**Customer Name:** Mr Paul Miles

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02459/1/001  
**Customer Name:** Ms Cathy Comber

**Summary of representation:**

One large site could easily provide a school, doctor's surgery and it would not overload existing facilities near the other six sites.

Development has previously been approved for the site unlike the original six sites.

Green Belt in Pyrford is used for recreation activities.

The Pyrford sites are an integral part of the heritage setting of Pyrford and are protected by CS24 – Escarpments and Rising Ground of landscape importance.

The New Zealand Golf Course should be excluded as the number of houses needed can be delivered on the remainder of the site.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs

Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Regarding the exclusion of the New Zealand Golf Course from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land

to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 02463/1/001  
**Customer Name:** Miss Vicki Sullivan

**Summary of representation:**

Support for the Martyrs Lane site excluding the New Zealand Golf Course.

A single site would provide the opportunity for creating jobs, a school and medical centre and would alleviate the pressure on the existing local ones.

The land has none of the character, history and natural beauty associated with the land in Pyrford that is enjoyed by many walkers every day, unlike the Martyrs Lane site.

A single site would be more cost effective and would mean less impact on local residents than if six individual sites were developed.

The single site is very well served with public transport unlike the other sites. It also has access on to the A320 providing easy links to M25 and Woking. Any development on the Pyrford sites would cause more congestion and danger on the very small roads.

The site is close to major local employers.

The top part of the site was recently granted planning permission.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

Whilst the representation notes that the New Zealand Golf Course should not be developed as the site is large enough to accommodate 1024 dwellings, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on infrastructure provision the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary

infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Residential development at any of the safeguarded options should be able to meet the infrastructure requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst some Green Belt land in the borough offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of

development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits

of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

**Contributor Reference:** 02467/1/001  
**Customer Name:** Mr Reece Humphreys

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The site includes previously developed land and is now semi-derelict

The northern site is publicly owned land so the sale would help council tax payers

The site has been used for non-agricultural purposes.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers.

Fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming

the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02480/1/001  
**Customer Name:** Mr Dennis Bailey

**Summary of representation:**

Supports the proposal to consolidate the six sites into one. This would address the infrastructure issues of the six sites and allow for the provision of new facilities such as a school and health centre.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It should be noted that the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should also be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02470/1/001  
**Customer Name:** Mrs Sarah Lardner

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course. The site is large enough to accommodate the required housing numbers. The golf course provides important leisure and employment amenity for residents.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land unlike some of the other sites which are used for recreation.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

Fewer residents will be disrupted by one site then by six individual sites.

The site has been used for non-agricultural purposes. The site excluding the golf course is previously developed and has a lower land value. Agricultural land in Pyrford will have a higher land value. The land to the north of the site is almost unused, pre-developed and derelict.

The northern part of the site is well served with public transport unlike the other six sites.

The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre. Surrey reports highlight that Martyrs Lane will have less impact on traffic conditions than the development proposals for Mayford or the combination of developments proposed for Byfleet and Pyrford.

The northern part of the site is close to major local employers.

Part of the northern site is publicly owned land so the sale would help council tax payers. Surprised it was overlooked within the initial review.

The Martyrs Lane site provides a viable option for housing expansion in the borough as it has the capacity.

**Officer Response:**

Support for the Martyrs Lane proposal has been noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst the representation highlights that the site is large enough to not require the New Zealand Golf Course to be safeguarded, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf

Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL

contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is also correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Regarding the representation on land values, residential development at any of the safeguarded options should be able to meet the planning policy and infrastructure requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages between the sites.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along

the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to

exacerbate congestion along the A320 corridor between Woking town centre and the M25 as well as the A245 towards West Byfleet.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

To confirm, parcels of land within the Martyrs Lane site that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The three sites include Woodham Court, land to the east of Martyrs Lane (Waste safeguarded site) and land adjacent to 462 Woodham Lane. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too

isolated to be a standalone development. It is therefore incorrect for the representation to suggest that land within the site was originally overlooked.

The merits of the New Zealand Golf Course as well as the remainder of the Martyrs Lane site for safeguarding will weigh in the balance of considerations by Members.

**Contributor Reference:** 02472/1/001  
**Customer Name:** Mr Mohammed Khan

**Summary of representation:**

The site does not have the capacity and road infrastructure to support this amount of housing, especially taking into account other development in the area including Sheerwater, St Peters Way Chertsey and Fair Oaks.

There is a need for affordable housing in the area so it would be better spread out over a number of sites that would have less impact on the Green Belt.

**Officer Response:**

Based on the Council's calculations, it is anticipated that the site can accommodate 1200 dwellings as set out in the Consultation Paper. Nevertheless, as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

If the Council decides to safeguard Martyrs Lane for future development needs then its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater and those at Fair Oaks and St Peters Way. Whilst the Council has undertaken Strategic Transport Assessments to inform the Site Allocations DPD, at this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable delivery of the major developments.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and achieve positive viability. The preference for a distribution of affordable housing however is noted and will be considered by Members.

The representation regarding the impact on the Green Belt and further information regarding the Council's traffic assessments have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02473/1/001  
**Customer Name:** Ms Alison Graham

**Summary of representation:**

The proposal puts too much strain on one area.

Traffic congestion is currently an issue in the area, particularly on the A320 and A245. The site is not within walking distance of a station and the bus service is poor. A complete overhaul of the bus network would be required. There is no medium/long term transport policy other than more car journeys which is not sustainable.

Development should be prioritised to areas which can offer rail connections within walking distance or effective public transport, roads without traffic hotspot issues or where roads can be widened. The A320 is adjacent to the Thames Basin Heaths SPA and a SSSI which are delicate habitats.

No consideration has been taken of development elsewhere, such as the one proposed for Fair Oaks Airport. In combination this will have a significant adverse impact on traffic and congestion as well as air quality.

If sites cannot be identified to ease traffic congestion, then development needs to be spread around the borough.

**Officer Response:**

The representation regarding the existing road network and congestion, the lack of public transport in the area and the Council's strategic transport objectives have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

In addition to the section on transport within the Topic Paper, the Council is aware of the potential development at Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of this development on the A320. However, the Council is working in partnership with Surrey Heath as well as Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the development, and in particular, the implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the major sites.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of

the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The representation regarding the distribution of development across the borough is noted and will be considered by Members. The overriding objective of this particular consultation exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

**Contributor Reference:** 02477/1/001  
**Customer Name:** Mr Andre Philpot

**Summary of representation:**

Support for the proposal at Martyrs Lane. The site is large enough to accommodate all the development needs on one site and also allow for additional development such as schools and health facilities. Due to the size of the site it would also accommodate additional housing if required in the future. The other sites do not offer this benefit.

Infrastructure provision can be implemented and will be more easier to do and cost effective. The other sites will not be able to support additional development.

The Martyrs Lane site has fast and easy access to the M25 and the surrounding area and there are also major employers nearby.

The site is mainly unused or derelict so development will regenerate the area and provide businesses to be created or relocated to support the new population.

It will preserve more of the Green Belt in other areas in the Woking which otherwise could be lost forever to the detriment of the people of Woking.

Planning permission has previously been granted for development on the site and there are few flood restrictions. The planning and development process should be easier and have reduced costs than the other proposed sites.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

It should be noted however that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of

about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from

various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is

identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The safeguarding of Martyrs Lane for future development needs may not require Green Belt to be developed in other areas of the borough between 2027 and 2040. Nevertheless the overriding consideration of this consultation is to ensure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications.

The overall merits of the Martyrs Lane site will weigh in the balance of considerations by Members.

**Contributor Reference:** 02479/1/001  
**Customer Name:** Ms Kay Philpot

**Summary of representation:**

Support for the proposal at Martyrs Lane. The site is large enough to accommodate all the development needs on one site and also allow for additional development such as schools and health facilities. Due to the size of the site it would also accommodate additional housing if required in the future. The other sites do not offer this benefit.

Infrastructure provision can be implemented and will be more easier to do and cost effective. The other sites will not be able to support additional development.

The Martyrs Lane site has fast and easy access to the M25 and the surrounding area and there are also major employers nearby.

The site is mainly unused or derelict so development will regenerate the area and provide businesses to be created or relocated to support the new population.

It will preserve more of the Green Belt in other areas in the Woking which otherwise could be lost forever to the detriment of the people of Woking.

Planning permission has previously been granted for development on the site and there are few flood restrictions. The planning and development process should be easier and have reduced costs than the other proposed sites.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

It should be noted however that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of

about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from

various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is

identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The safeguarding of Martyrs Lane for future development needs may not require Green Belt to be developed in other areas of the borough between 2027 and 2040. Nevertheless the overriding consideration of this consultation is to ensure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications.

The overall merits of the Martyrs Lane site will weigh in the balance of considerations by Members.

**Contributor Reference:** 02489/1/001

**Customer Name:** Mr And Mrs Nick And Gill Parker

**Summary of representation:**

Support the Martyrs Lane proposal. It will save a lot of Green Belt land and be confined to one area which will be less obtrusive to a lot of people and the surrounding area.

The site is mostly disused and the road infrastructure is already in place and cause less disruption.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It should be noted that the Martyrs Lane site is larger than the cumulative area of the six original sites identified for safeguarding in the draft Site Allocations DPD.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst it is correct that the site has access to the road network, this is also true of the other six sites which also have access to existing roads.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);

- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02493/1/001  
**Customer Name:** Ms Catriona Marchant

**Summary of representation:**

Objects to the Martyrs land proposal due to:

The loss of a large area of green belt land.

Increased flood risk in this low area.

Pressure on transport and a lack of public transport.

Too much stress on infrastructure including Schools, doctors and hospitals.

Loss of woodland and wildlife.

**Officer Response:**

The representation regarding flooding, public transport, transport and wider infrastructure and the impact on woodland and biodiversity has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Matters Topic Paper.

Whilst it is noted that the safeguarding of the site to meet future development needs would reduce the amount of Green Belt land in the borough, the overall total of Green Belt land proposed to be released from the Green Belt is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02437/1/001  
**Customer Name:** Ms Barbara Stentiford

**Summary of representation:**

Supportive of the proposal as it would render sites GB12 and GB13 in Pyrford unnecessary for allocation.

The residents of Pyrford village feel very strongly that there should not be substantial growth in the size of the village due to development. As a result of the 2016 referendum, Woking Borough Council are required to give due consideration to the views of the residents of Pyrford in their planning decisions.

The proposed developments near Teggs Lane and Upshot Lane, Pyrford for the building of over 400 properties will destroy large areas of green belt surrounding the village. It is this green belt area that has stopped Pyrford from simply being swallowed up by Woking town, enabling Pyrford to maintain it's character as a small, local village.

**Officer Response:**

The Council accepts that any land taken out of the Green Belt will lead to a reduction of the amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives. The Sustainability Appraisal Report provides the evidence to support this view. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about 3.46% of the total area of the Green Belt.

The Green Belt Boundary Review assessed parcels of land against the purposes of the Green Belt, one of which is preventing neighbouring towns from merging into one another, and another purpose is to check the unrestricted sprawl or large built-up areas. The Council do not consider that the potential development of identified parcels around Pyrford would significantly reduce separation between towns or lead to unacceptable urban sprawl.

There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved.

Overall, the Council is satisfied that the social, environmental and economic character of Pырford will not be significantly undermined.

**Contributor Reference:** 02439/1/001  
**Customer Name:** Mr Cliff J Bolton

**Summary of representation:**

Difficult consultation as all of the sites are in the Green Belt. On balance, supports the proposal to deliver 1024 dwellings at Martyrs Lane excluding the New Zealand Golf Course.

Much of the northern section of the site has been used for non-agricultural purposes.

Part of the site was granted planning permission for McLaren Technologies.

It is not high value agricultural land.

The land values of the site are lower compared to Pyrford and there is an opportunity to provide some affordable housing for key workers and social housing.

A single site would offer economies of scale to address the infrastructure issues.

The northern part of the site is well served with public transport.

The northern part of the site has easier access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre.

The northern part of the site is close to major local employers.

Part of the northern site is publicly owned land so the sale would help council tax payers.

Fewer Woking residents would be impacted by the development compared to the other six sites, in particular as few people live close to the site.

Much food is now imported and therefore the Pyrford sites should be retained for agricultural purposes.

Pyrford School and West Byfleet Health Centre are at capacity and the Martyrs Lane site could provide new facilities.

There are no plans to improve the infrastructure in West Byfleet which is expected to see a significant amount of development.

The Pyrford and West Byfleet roads are at capacity and dangerous.

Supports the Martyrs Lane proposal.

**Officer Response:**

Support for Martyrs Lane and objection to development in Pyrford is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established in the Core Strategy and is also consistent with national planning policy. This has been addressed in greater detail in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Section 1.0 and 2.0.

Regarding the representation to exclude the New Zealand Golf Course from the site area, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated

as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Whilst it is correct that much of the land is not used for agricultural purposes, the same can be said for the majority of the sites identified for safeguarding in the draft Site Allocations DPD. In addition as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25 as well as the A245 towards the A3.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02440/1/001  
**Customer Name:** Mrs Penny Matthews

**Summary of representation:**

Pyrford Green Belt is prime land and used for agricultural purposes.

The Martyrs Lane site, excluding the New Zealand Golf Course, has in part already had planning permission granted for a technology centre. The site is also partly previously developed land and derelict.

A single site would be more economical and alleviate some of the infrastructure issues such as affordable housing, education and healthcare facilities.

**Officer Response:**

Regarding the representation relating to the agricultural use of the Pyrford sites, it should be noted that as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of whether one site or several sites are safeguarded. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst the safeguarding of the Martyrs Lane site for future development needs may not require the Council to identify other sites in the Green Belt for future development, the overriding objective of the consultation is to inform the Council's decision on its preferred safeguarding strategy and ensure that the most sustainable sites are safeguarded when compared with all reasonable alternatives. The merits of the Martyrs Lane site and the reasons against development in Pyrford will weigh in this balance.

**Contributor Reference:** 02442/1/001  
**Customer Name:** Ms Susan Gigg

**Summary of representation:**

Support the Martyrs Lane proposal as it would produce economies of scale to address the infrastructure issues. Developing small sites will overload the existing over capacity local infrastructure.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02445/1/001  
**Customer Name:** Mr Tim R Matthews

**Summary of representation:**

The Martyrs Lane site is appropriate as it is one large site that already has been granted planning permission for development. The site is in part derelict and in need of development.

The required services such as water and other utilities would have easy access to the site beneath the A320. The A320 provides excellent transport links into and out of the town.

Broadband is also conducted along this thoroughfare.

A single site would provide economies of scale and allow for new infrastructure to be built. The six original sites have no expandable potential for services, traffic or IT infrastructure. These sites include large areas of land that are used for agriculture and recreation.

Support for Martyrs Lane and objection to the six original sites.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

Whilst the site is not used for agricultural purposes, the same can be said for the majority of the original six sites identified in the draft Site Allocations DPD. In addition, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality

agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be recreational benefits to some or all of the other six sites, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02447/1/001  
**Customer Name:** Ms Clare Benham

**Summary of representation:**

Would prefer no major house building in Woking but accepts that it has to happen.

One large site allows for better infrastructure within the development.

Martyrs Lane has access to the M25 without a major impact on village life and roads, unlike the other six sites which would have a significant effects as the roads are too small for an increase in traffic. The A320 is large and could be widened unlike the existing roads in the villages. It also allows for travel without having to drive through Woking or West Byfleet for the M25. The site is also well placed for Woking Station.

The site is currently disused and has planning permission for McLaren, therefore there is the principle of development. It has less surrounding residents than the other areas and therefore impact fewer people.

**Officer Response:**

Regarding the representation on infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The reasons against development in other areas of the borough have been addressed previously by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02449/1/001  
**Customer Name:** Mr Andrew Malcher

**Summary of representation:**

Repeats an email from Woking Borough Planning Policy Team outlining the purposes of the Land to the east of Martyrs Lane consultation.

Objects to the proposals based on government, Surrey County Council and Woking Borough Council documents. The proposal is badly thought out and contrary to the intent of the published guidelines.

When analysing the public responses, the reasons why the published advice and guidelines were ignored should be set out.

Quotes Paragraph 7 of the NPPF regarding the definition of sustainable development.

The Martyrs Lane site is not sustainable due to the location which has poor accessibility to local services. Existing local infrastructure are only accessible by car and the only public transport connection has been withdrawn.

The existing cycle network is incomplete and dangerous.

The local hospital is at capacity and unable to meet patient waiting guidelines. It does not have the capacity to handle more patients. Development along the A320 will also add to the time to get to St Peters Hospital by road.

Development of this site directly contravenes the stated environmental aims of the NPPF.

The County Council's Infrastructure Study, part 7, shows that there is a shortage of school places, health facilities are at capacity and the road infrastructure is near to or in excess of capacity. It also shows that there is insufficient funds to bring the infrastructure up to standard as there is a funding gap of £3.2billion.

Developers will only provide the essentials needed to deliver a scheme. Large scale development planned by other local Councils will result in gridlock together with economic and social collapse. This is not sustainable. CIL or other development contributions are not large enough to overcome this shortfall.

The GBBR Sensitivity Test Addendum Report to Strategic Transport Assessment is not correct in its estimates as a population of 3000 residents will result in more than 454 car movements in the morning rush hour, given there will be no employment, schools or health centres on the site. The same survey states that the A320, A245 and B385 are already operating at near maximum capacity. The extra traffic from this development will only add to congestion, delays

and pollution. The traffic model does not take into account the development proposals of Fair Oaks or Longcross. It should be discredited as a tool.

The SHMA (2015) identifies housing need. Developers will only concentrate on market housing for 3 bedroom and above units in greenfield locations to maximise profits. Smaller/affordable housing is needed to meet housing needs and bring back some mobility into the broken housing market.

Affordable housing is CIL exempt so there will be a further infrastructure gap. Developers have promised to build affordable homes in Woking before and have back tracked on this and not held to account.

The principle of Green Belt is to prevent urban sprawl and give the local population access to fresh air and outdoor leisure activities. The government pledged to protect the Green Belt. With current levels of traffic, pollution, stress and obesity, the need for Green Belt is stronger than ever. None of it should be sacrificed for short term economic gain. It is hypocrisy by the Council to promote the benefits of Green Belt to business and future residents whilst engineering its destruction.

Of the many smaller locations identified and discussed in the Core Strategy (Policy CS6), there is no mention of Martyrs Lane.

The review of the Green Belt is supposed to retain areas of defensible Green Belt to provide permanent gaps between urban developments in the future. Development of this site is contrary to this purpose as the only defensible boundary is the River Bourne and its flood plain. The borough boundary is not defensible as the adjoining borough is likely to adopt the same approach within their borough. This will result in an urban continuum from Chertsey, Addlestone and Ottershaw to Woking.

In summary the proposals do not provide the type of housing required for the younger generation in the local area, let alone for new residents or the desire for economic growth. The proposed developments are not sustainable and will simply add pressure, pollution and congestion to the area. The infrastructure is already close to breakdown, with no funding available to fix it. No further incursion should be allowed on Green Belt land, since it is vital for the health and welfare of the population of London and the Home Counties and of strategic importance to the long term survival of the ecosystem of this planet.

#### **Officer Response:**

Objection to the Martyrs Lane site and the original proposals are noted.

Regarding the representation highlighting the inaccessible location of the Martyrs Lane site, this issue has been noted by Officers within the Sustainability Appraisal (SA) for the Martyrs Lane site. Specifically the SA states that 'The site has limited accessibility to existing services and facilities due to its somewhat isolated location, and due to the canal acting as a barrier to

the urban area to the south. It is beyond reasonable walking distance to key services and facilities in any local centres. The need to travel to access existing services and facilities would be increased, although sustainable modes of travel by bus and bicycle are possible. A neutral score (for this sustainability objective) has been given because although access to existing services and facilities is limited, with development of this scale there is an opportunity to provide new local community services and facilities in the medium–long term. Access by bus and bicycle to the Town Centre is also good, and any development proposals at this site can help improve these access modes'. This matter will weigh in the balance of considerations by Members.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments and set out in the Sustainability Appraisal, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

A key thrust of the transport policies of the Core Strategy and the NPPF are to influence a shift from car based travel to sustainable travel modes such as public transport, walking and cycling. Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy clearly demonstrate the importance that the Council places on encouraging walking and cycling. These policies have been scrutinised at Examination and judged to be in conformity with the NPPF.

In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards SPD is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality. Policy CS18 of the Core Strategy makes this point very clear.

Woking was designated as a Cycle Demonstration Town in 2009 and received a significant amount of money (about £1.8M) to improve cycle infrastructure. The investment of this amount and other funding has had positive outcomes in the borough. For example, it has resulted in significant overall increase in cycle journeys across the borough. Whilst the Local Sustainable Transport Funding from government has ended, the Council continues to be committed to improving cycle infrastructure and this is reflected in the Regulation 123 list of projects to benefit from CIL contributions. The Council is currently investing about £24M to improve transport infrastructure at the Town Centre, including improvement to the bus/rail

interchange near the Station to enhance public transport connectivity. Part of this funding is from the Local Enterprise Partnership.

It should also be noted that the existing cycle network is a matter that would be considered in detail at the Development Management stage. If detailed transport assessments indicated that additional cycling improvements were required to make the development acceptable, then this would be secured through the Development Management process.

Regardless of whether the Council decides to safeguard the Martyrs Lane site or the original six safeguarded sites, it is committed to working with the local Clinical Commissioning Groups (CCGs) in identifying future healthcare requirements based on increased population growth and its dispersal across the borough. It should also be noted that St Peters Hospital is currently consulting on proposals to redevelop the site; these proposals also include additional hospital facilities.

The Green Belt Boundary Review Sensitivity Test Addendum Report to Strategic Transport Assessment calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. In particular on the A320 and A245 corridors. In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The 454 car movements quoted in the representation highlight the 'Vehicle Arrival Trips' to the Martyrs Lane site if the site was developed for 3000 dwellings (Scenario H). It should also be noted however that the same scenario is expected to result in 1,570 'Vehicle Departure Trips' in the weekday AM peak hour, resulting in a total of 2,024 vehicle trips during the weekday AM peak hour. The Council is satisfied that the Green Belt Boundary Review Sensitivity Test Addendum Report to the Strategic Transport Assessment provides robust evidence to enable the Council to make informed decisions on its preferred safeguarding option. It should also be noted that the Martyrs Lane consultation is based on the site delivering at least 1200 dwellings, and not 3000 dwellings as was tested in the transport assessment.

The transport studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council is also aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

Regarding wider infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website which is also currently being updated.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Although CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site, it has always been very clear to the Council that infrastructure funding has never been and cannot be met entirely by developer contributions. Public sector contributions have and will always be a significant part of infrastructure funding, and the Council works tirelessly with relevant agencies to secure public sector and other sources of funding for infrastructure projects. For example, the CIL Charging Schedule identifies the priority infrastructure to support the delivery of the Core Strategy, how much it will cost, how much of the funding will be met from developer contributions and how much is expected to be secured from public sector sources. This gives an indication of the scale of public sector funding expected to help deliver the identified infrastructure.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to quantify the transport and education provision needed to support the development and how they could be delivered. All other relevant infrastructure and utility providers are also consulted to help assess the infrastructure needs to support future growth. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

Reference to the Strategic Housing Market Assessment (SHMA) (2015) is noted. The previous SHMA was the basis of the Core Strategy, in particular the housing policies of CS10: Housing provision and distribution, CS11: Housing mix, CS12: Affordable housing and CS13: Older people and vulnerable groups. As clearly set out in Policy CS11, all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the SHMA in order to create sustainable and balanced communities. This policy requirement will be considered at the Development Management stage regardless of whether the site is in the urban area or Green Belt.

The Council would also draw the representor's attention to the draft Site Allocations DPD. Many of the sites identified for allocation fall within the existing urban area on previously developed land. In the town centre in particular, supported by Core Strategy Policy CS1, a significant number of the sites are allocated for high density residential development which is likely to comprise of non-family accommodation, namely 1 and 2 bedroom flats. It is therefore incorrect to suggest that overall development in the borough will be 3 or more bedroom greenfield developments.

In addition to the above, Core Strategy Policy CS12: Affordable housing as well as the Affordable Housing Delivery SPD set out the Council's affordable housing requirements for new development. As set out in CS12, the Council will expect a higher proportion of affordable

housing on green field sites due to the lower cost of developing these sites compared to previously developed sites in the urban area. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability.

As set out in paragraphs 173 and 174 of the NPPF as well as the Core Strategy and Affordable Housing Delivery SPD, sustainable development should take account of development viability. Where onsite affordable housing on a proposed development scheme is not economically viable, the Council will expect the submission of financial appraisal information to demonstrate this. This is then subject to scrutiny by an independent expert at the development management stage. The Council therefore does not agree that developers are not held to account regarding the lack of affordable housing on development proposals.

Whilst it is correct that one of the five purposes of Green Belt is to check the unrestricted sprawl of large built-up areas, it is not a purpose of Green Belt to provide the local population with access to fresh air or outdoor leisure activities. This is confirmed in paragraph 80 of the NPPF. Whilst the Green Belt can provide people with opportunities to access the natural environment as well as sports and recreation facilities, they do not fall within the defined purposes of the Green Belt.

As set out in the Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case to release Green Belt land for development, and safeguard land for future development needs, has already been established in the Core Strategy which was found sound by an Inspector appointed by the Secretary of State.

Whilst the Council notes that the Green Belt provides residents with a number of benefits, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is correct that the Core Strategy does not make reference to the Martyrs Lane site. The Core Strategy sets out 25 strategic policies for the borough and does not allocate specific sites for development. This is the purpose of the Site Allocations DPD which the Council is currently preparing.

The Landscape Assessment and Green Belt Review for land to the east of Martyrs Lane by Hankinson Duckett Associates specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report (Green Belt Boundary Review). The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

As set out above the Council is also working with neighbouring authorities to take into account development proposals and plan preparation in neighbouring boroughs.

The environmental implications of the proposals will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

The reasons against development at Martyrs Lane as set out in the representation are noted and after balancing all the relevant issues, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

**Contributor Reference:** 02464/1/001

**Customer Name:** Mr And Mrs John And Eliene Fotheringham

### **Summary of representation:**

Martyrs Lane will have the least impact on Woking. It is a single site, been previously developed, partially derelict and less than half of the site is needed.

Pyrford Green Belt is virgin Green Belt, used for agriculture and used for recreational purposes. It is also fundamental to the semi-rural character of the village and escarpment. The sites also have views to the south.

Martyrs Lane has no landscape element, no known footpaths and the public seem not to use it. The site was granted planning permission for the McLaren Technology Centre in 2012. The Officer report noted that there is no risk of merger or sprawl. The land also contains former army buildings and a disused sports field. The Surrey County Council waste site is derelict and been offered to Woking Borough Council for sale and Green Belt release for several years. The 3 sites to the north of the New Zealand Golf Course should have been prioritised by WBC in its initial Regulation 18 Consultation but seem to have been overlooked.

There has been confusion regarding the number of dwellings required to be safeguarded. The Pyrford Neighbourhood Forum maintains that 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required. Includes hyperlink to density table on external website.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

## Officer Response:

Support for the Martyrs Lane proposal is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Regarding the representation stating that only some of the site will be required for development, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Parcels of land within the Martyrs Lane site that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Regarding the representation on economies of scale to resolve infrastructure issues, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this particular stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Whilst the merits of the Martyrs Lane site have been noted, it would be incorrect to state that the site is not used for recreational activities as it contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. As part of the consultation, the Council has consulted with Sport England and their comments will be addressed separately and will be used to inform the Council's decision on its preferred safeguarding strategy.

The representations relating to heritage and local character in Pyrford have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

**Contributor Reference:** 02475/1/001  
**Customer Name:** Ms Sue Tasker

**Summary of representation:**

Supports the Martyrs Lane proposal and object to the proposed development of any other of the designated sites within the Borough of Woking.

Whilst the Core Strategy identifies the need to release land from the Green Belt for sustainable development, national planning policy states that this should only occur in exceptional circumstances. The Martyrs Lane site fully meets these criteria.

The Martyrs Lane site is close to major employers and transport infrastructure including the M25, West Byfleet Station and public transport into Woking town centre.

Martyrs Lane is more suitable for development as its land character is more fitting than the other proposed areas of Woking earmarked for potential development.

Development would make the best use of abandoned land.

Any benefit from the positive increase in land values brought about by the development of Martyrs lane would be beneficial to the Woking economy if reinvested correctly. Only the development of Martyrs Lane would achieve this benefit.

The release of Green Belt at Martyrs Lane would make a sensible and reasonable change to the Green Belt and would comply with the NPPF. It would also benefit the whole of the Woking community. Development would have the added advantage of not creating an isolated Green Belt and would maintain a permanent Green Belt boundary.

Development would safeguard the Green Belt in other parts of the Borough which are less suitable for development.

The Consultation Paper contains many errors and inaccuracies when considering Safeguarded sites. For example Woking Borough Council fails to consider that removing sites GB10 & GB11 from the Green Belt would result in sites GB14 and WGB020g becoming isolated areas of Green Belt and therefore lend themselves to eventual removal from the Green Belt. This will result in the slow destruction of the Green Belt by stealth. The use of Martyrs Lane for this proposed development would safeguard sites GB10, GB11, GB14 & WGB020g.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

Based on the wording of the representation, objection to all other designated sites within Woking Borough is also noted.

As set out in Section 1.0 of the Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy (NPPF). It is therefore considered that all of the proposed safeguarded sites meet the exceptional circumstances requirements of the NPPF and there are no clear advantages between the different sites.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on land character, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the various landscape characteristics of each of the sites. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst the safeguarding of the site for future development needs may increase land values and boost the wider Woking economy as suggested in the representation, the purpose of the consultation is to inform Council's decision on its preferred safeguarding option. The overriding consideration in this respect is to ensure that the most sustainable land is safeguarded when compared to all reasonable alternatives.

As set out in the Regulation 18 consultation Issues and Matters Topic Paper as well as above, the Site Allocations DPD has been informed by robust evidence. This evidence suggests that the sites identified in Mayford, Pyrford and Byfleet are the most sustainable when compared against all reasonable alternatives for the purposes of safeguarding land for future development needs. Any new evidence submitted to the Council as part of this consultation will help Members make the final decision on the Council's preferred safeguarding option.

Whilst the removal of the land to the east of Martyrs Lane would create a new defensible Green Belt boundary, it is considered that the removal of the original six sites would also have created a defensible Green Belt boundary. There is therefore no advantages on this particular matter between the Martyrs Lane site and the six original sites. The Green Belt Boundary Review (2014) as well as the Landscape Assessment and Green Belt Review (2016) address this matter in greater detail.

It is not considered that the Martyrs Lane Consultation Paper is incorrect and contains inaccuracies. If the Council decides to safeguard GB10 and GB11 for future development needs between 2027 and 2040, then the sites referred to in the representation as GB14 and WGB020g would become isolated pockets of Green Belt as they would be cut off from the rest of the Green Belt by the allocation of GB10 in particular. These pockets of land would not fulfil the purposes of Green Belt as set out in the NPPF. The Council has been very clear in the draft Site Allocations DPD that GB14 would be removed from the Green Belt for green infrastructure purposes whilst the land referred to as WGB020g would become part of the urban area. This is clearly set out under GB14 in the draft Site Allocations DPD. Should the Council decide to safeguard the land to the east of Martyrs Lane for future development needs instead of GB10 and GB11, then the removal of GB14 and WGB020g may still be necessary to provide green infrastructure to support development in the wider area and form a robust Green Belt boundary. This is a matter that would be considered by the Council when making its final safeguarding decision.

**Contributor Reference:** 02487/1/001  
**Customer Name:** Ms Helen O'Donovan

**Summary of representation:**

Strongly dispute the viability of safeguarding land for development in Pyrford, some of which has views of the Surrey Hills Area of Natural Beauty.

Recognise that housing is required and prefers Martyrs Lane for this purpose. It is important that it is supported with schools, health care provision, local amenities for all age groups and acceptable transport which does not impinge upon the environment.

There are an excess of golf clubs in the area and the development of one of these would fulfil housing requirements. The New Zealand Golf Course does not provide membership to local residents and therefore is not a local amenity. Whilst building on New Zealand golf course is not necessarily included in the proposal, this could be considered, provided that the impact would not be detrimental compared to other options to those who live closest to the proposed Martyrs Lane site.

Martyrs Lane is less attractive environmentally and generally has wider access by road in the very close vicinity.

Health care, schools, sports, leisure facilities would be important – the current GP practices would not be able to support increased housing (of any level).

The north of the Martyrs Lane site in particular is poorer quality Green Belt with no public access. The south part includes the New Zealand golf course which does not provide membership to locals.

**Officer Response:**

Objection to the Pyrford sites for future development needs and support for the Martyrs Lane proposal is noted.

Regarding the representation on the provision of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried a number of separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. These are on the Council's website. The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development. This would include ensuring that development does not have a harmful impact on the environment and that it meets the required environmental standards. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. It should be noted that these policies would apply to all development across the borough regardless of whether it is at Martyrs Lane or any of the other proposed sites.

Whilst it is recognised that there are a number of golf clubs within Woking Borough, it is important to ensure that the sites identified for future development are the most sustainable when compared against all reasonable alternatives and that the removal of these sites from the Green Belt will not undermine its overall purpose and integrity. It is also important to balance housing needs against the general well-being of residents and the loss of sporting facilities. The membership requirements of the New Zealand Golf Course is not a material planning consideration.

To confirm, the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage the Council has not ruled out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape and environmental merits of the sites. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest.

**Contributor Reference:** 02490/1/001

**Customer Name:** Mr David Bish

**Summary of representation:**

Object to the proposed safeguarding of Martyrs Lane.

It is vital that Green Belt adjacent to Woodham be preserved for future generations. Its destruction would be irreversible. There is already insufficient Green Belt surrounding this area and is quickly merging with other built up areas to create a massive urban area. Countryside is needed around towns. Government policy on Green Belt states that boundaries should only be altered in exceptional circumstances and has recently been confirmed by the Prime Minister. Quote from PM included in the representation.

There are reasonable alternatives to this site. There are no special circumstances to justify urban development of this land. By even considering such a proposal Woking Borough is disregarding independent reviews it has itself commissioned. See Hankinson and Duckett under Sprawl.

The area under consideration is important heath land. The destruction of vegetation in the area is obvious and cannot be defended. It would be irreversible. Developing the area would be detrimental to wildlife. This detriment would be irreversible and have to be suffered by future generations. The site also borders on to other valuable heath land and the detriment to vegetation and wildlife would extend beyond the area being considered into these adjacent areas.

This specific part of the Green Belt checks the urban sprawl of Woodham. Woking Borough Council are disregarding what is happening in adjacent boroughs and Woodham may eventually become joined to Fairoaks, Chertsey, Addlestone and Ottershaw.

Fairoaks development could also result in sprawl and the only way Woking Borough Council can contain this sprawl is to protect the adjacent Green Belt within its boundaries. Similar arguments apply in respect of maintaining green belt between Woodham and other close urban developments in the pipeline at Row Town, Ottershaw and Longcross.

Woking Borough Council appears to be ignoring reviews it has itself commissioned. In August 2016 Hankinson and Duckett concluded that the area under consideration has 'critical importance towards the purposes of Green Belt in checking urban sprawl and safeguarding the countryside'.

Some of the area under consideration is already at flood risk and new development will extend the flood risk beyond the current flood risk area. In addition land around the junction of Martyrs Lane and Woodham Lane already suffers from flooding at times.

There is already frequent bad road congestion in Woodham and West Byfleet including the A245, A320 and Six Crossroads Roundabout. These roads can not cope with any additional traffic.

Martyrs Lane itself is too narrow and widening this road would cause problems at the junction with the A245.

Access to local schools is also difficult and development would have an adverse impact on congestion.

Parking is an issue in West Byfleet, particularly at the Health Centre. Residents of the Martyrs Lane development would require access to this health facility and make the situation worse.

Over the years there has been a steady decline in public transport provision in the Woodham Lane area, will Woking Borough Council financially support new bus routes.

The local infrastructure is unable to support further development. This includes schools, GPs surgeries, hospitals, shops and mobile phone facilities, all of which would be inadequate.

The green belt to the east of Martyrs Lane is vital to maintaining the identity of Woodham and once developed cannot be recreated. Urges Woking Borough to think again and if extra development is needed then it should be carefully integrated into existing communities across the borough. Destroying the precious Green Belt to the east of Martyrs Lane is not the answer.

#### **Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation regarding the principle of Green Belt development, urban sprawl and the proposed development at Fair Oaks have all been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

The land to the east of Martyrs Lane is not a designated Thames Basin Heaths Special Protection Area and therefore could not be accorded the same status with the same policy justification for its protection. Nevertheless the ecological significance of the land will continue to be conserved and taken into account in the consideration of any development that could have potential impacts on its ecological integrity. This matter as well as the representation on wildlife has also been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of

the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The representation regarding flooding, road infrastructure and congestion, public transport and wider necessary infrastructure have also been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

Regarding the representation on car parking, the Council has planning policies and standards in place to ensure that new developments are supported with adequate car parking provision. This also takes into account the location of the development and whether it is in close proximity to public transport. West Byfleet for example is well served by public transport and therefore a reduced parking provision for development in this area may be acceptable. The Council has recently published its revised Parking Standards SPD for consultation and is in the process of adopting the document to inform future planning decisions. The Council is also working with the Clinical Commissioning Groups (CCGs) to ensure that healthcare provision and its distribution across the borough reflects that of future development.

The representation noting a preference for integrating development into existing communities is noted and will weigh in the balance of considerations by Members.

**Contributor Reference:** 02491/1/001

**Customer Name:** Ms Kath Bish

**Summary of representation:**

Object to the proposed safeguarding of Martyrs Lane.

here is already insufficient green belt surrounding the urban areas in the boroughs of Woking, Surrey Heath and Runnymede. Government policy on Green Belt states that boundaries should only be altered in exceptional circumstances and has recently been confirmed by the Prime Minister. Quote from PM included in the representation.

This specific part of the Green Belt checks the urban sprawl of Woodham. There are a number of development proposals in the area including Sheerwater Regeneration Scheme and Fair Oaks. Fair Oaks in particular will result in urban sprawl. Runnymede Borough Council are also proposing to build further housing developments in the Rowtown/Rowhill area. This too will have an adverse affect on Woodham, which will be engulfed by urban sprawl, losing even more surrounding green space.

The green land to the east of Martyrs Lane acts as a break between Woodham and the adjacent urban developments. We cannot afford to lose this green belt. Once gone, it will never be replaced.

The area under consideration is important heath land.

Horsell Common and the new wetland area will be significantly impacted by the proposal, in particular wildlife and vegetation. Much of the common is part of a European Special Protection Area for vulnerable bird species. It would be sacrilege to build a new town next to this special habitat.

The land adjacent to Martyrs Lane floods and suffers from surface water. The proposed development will exacerbate the situation.

There is already frequent bad road congestion in Woodham and West Byfleet including the A245, A320 and Six Crossroads Roundabout. These roads can not cope with any additional traffic. Emergency vehicles have a frequent need to use this road to get to St Peters Hospital and to the adjacent ambulance station.

Martyrs Lane itself is too narrow and widening this road would cause problems at the junction with the A245.

The existing schools do not have the capacity for additional pupils and the West Byfleet Health Centre does not have adequate parking. The situation will get worse with additional development.

I believe that it is inappropriate for new homes to be built in the vicinity of the Martyrs Lane recycling centre because of noise, dust, increased risk of vermin and the type of traffic using the recycling centre.

It is inappropriate to propose a large new urban development in this area. I believe it is far more environmentally friendly to build smaller developments within existing communities across the borough.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation regarding the principle of Green Belt development, urban sprawl and Fair Oaks has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

As part of the Duty to Cooperate the Council is working with all neighbouring authorities to address the common issues of the area, including transport and Green Belt development. The extent of cooperation between the relevant authorities will be set out within a Duty to Cooperate Statement.

The land to the east of Martyrs Lane is not a designated Thames Basin Heaths Special Protection Area and therefore could not be accorded the same status with the same policy justification for its protection. Nevertheless the ecological significance of the land will continue to be conserved and taken into account in the consideration of any development that could have potential impacts on its ecological integrity. This matter as well as the representation on wildlife has also been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. The Council has also consulted with Natural England as part of the consultation process and their comments on this matter will be carefully considered.

The representation regarding flooding, road infrastructure and congestion, Martyrs Lane Recycling Centre and wider necessary infrastructure have also been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper. The Council is also working with the Clinical Commissioning Groups (CCGs) to ensure that healthcare provision and its distribution across the borough reflects that of future development and that through

working with the Highways Authority, that there will be no adverse impacts on emergency response times.

Regarding the representation on car parking, the Council has planning policies and standards in place to ensure that new developments are supported with adequate car parking provision. This also takes into account the location of the development and whether it is in close proximity to public transport. West Byfleet for example is well served by public transport and therefore a reduced parking provision for development in this area may be acceptable. The Council has recently published its revised Parking Standards SPD for consultation and is in the process of adopting the document to inform future planning decisions.

The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives. Therefore the representation regarding the environmental impact of the proposal will weigh in the balance of considerations by Members.

**Contributor Reference:** 02494/1/001  
**Customer Name:** Mr Joseph Pearson

**Summary of representation:**

Objects to the Martyrs Lane proposal.

Woodham Lane already has significant traffic congestion and recent roadworks on the A320 demonstrate that the area can not cope with a large sustained increase in traffic volumes. Further development will make the situation worse. The government regularly release figures to demonstrate the cost to the economy that transport delays produce and the toxic effect of vehicular exhausts have on local inhabitants.

Medical services at both St Peters Hospital and West Byfleet Medical Centre are at capacity and development will add further strain on these services to the detriment of existing and future residents.

There is a lack of school places and development will make the situation worse.

Public transport is poor and will not alleviate pressure on the road network or parking at local stations.

There will be a significant impact on the environment. The loss of Green Belt will exacerbate poor air quality whilst tree removal will increase flood risk. Flooding is already an issue for the A320.

Loss of habitat for wildlife would be substantial and with Fair Oaks Garden Village also being proposed the impact on local wildlife could be catastrophic.

Martyrs Lane recycling centre already causes traffic problems at weekends and it is not clear whether it would be able to support any increased usage and additional waste.

It is strange that Woking Borough Council would want a large development with a number of inherent problems rather than spreading the load across the borough. Perhaps councillors feel more comfortable to make a very bad situation in one place where fewer people are impacted, however badly, rather than having more people just mildly irritated with a number of smaller developments spread around the borough. No budget has been allowed for major infrastructure improvements. There will be no additional cost to the Council to make several small developments instead of one huge one.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

In addition, it should be noted that the Council is working with the local Clinical Commissioning Groups (CCGs) to ensure that healthcare provision and its distribution across the borough reflects planned development.

The environmental implications of any of the proposed sites in the Site Allocations DPD will be required to meet environmental standards at the Development Management stage. The Council has a number of policies in place to ensure that development avoids unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

Regarding the representation on the capacity of the Martyrs Lane Recycling Centre, the Council has consulted with Surrey County Council who is the waste authority for the area. They have responded to the consultation and their comments will be considered. In addition, the waste authority is currently in the process of updating the Surrey Waste Plan and it is expected to identify a number of sites across the county that will manage waste and recycling. As the number of dwellings proposed for the Martyrs Lane site is broadly similar to the six original sites, there is no clear advantage between any of the sites on this matter.

The overriding consideration of this consultation is to identify the most sustainable land when compared against all other reasonable alternatives. The information that is gathered from the representations is useful evidence to inform the Council's decision on the matter. Therefore the decision by Members to consult on the Martyrs Lane proposal was appropriate in order to inform the Council's final safeguarding strategy.

**Contributor Reference:** 02499/1/001  
**Customer Name:** Ms Linda Povey

**Summary of representation:**

Support the Martyrs Lane proposal.

The site available is large enough to accommodate 1,200 houses and the required traveller sites as well as the necessary infrastructure to support such a housing development including schools, shops, and medical facilities. It could also accommodate additional development if required. It would not be viable to provide the necessary infrastructure for much smaller development sites. In Mayford, there is very little in the way of shops and no medical facility.

The roads in Mayford are narrow and would not be suitable for widening to accommodate any increase in traffic. The A320 is already very busy, a situation that will be exacerbated when the new Hoe Valley School opens. The roads in the Martyrs Lane appear to be much more suitable for widening.

I understand that a proportion of the Martyrs Lane site is derelict and unused and that planning permission for a technical centre was obtained by McLaren which means the site is suitable for development. To utilise such land is surely far better than developing untouched Green Belt land.

Building at Martyrs Lane would allow for the provision of Affordable Housing and Specialist Residential Accommodation which would assist Woking Borough Council to meet its obligations in the areas.

There are very limited employment opportunities in Mayford whereas McLaren, St Peter's Hospital, Addlestone, Chertsey, Brooklands and The Byfleets as well as Woking itself are within easy reach of Martyrs Lane.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future

development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Regarding the representation on the road infrastructure in Mayford, this matter has been previously addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

In addition, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance

test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should also be noted that the other sites are of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02501/1/001

**Customer Name:** Robin Wilkin

**Summary of representation:**

Objection to development in Pyrford. Pyrford has a unique semi rural setting and is largely unspoilt with views. The fields are used for agriculture and form part of the historic setting of the area and heritage features. It is also used for recreational purposes.

The development proposals in West Byfleet will result in a significant number of new homes and is more than the existing infrastructure in Pyrford and West Byfleet can cope with.

Martyrs Lane will have the least impact on Woking overall as it is a single site and the north of the New Zealand Golf Course is almost unused. There is no landscape element, no known footpaths and not utilised by the public. Martyrs Lane is a better option for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas in Byfleet and Pyrford.

The site had planning permission for McLaren and there is no concern about the development being a risk to merger or sprawl. The site is a viable housing site.

**Officer Response:**

Objection to development in Pyrford and support for the Martyrs Lane proposal is noted.

It should be noted that as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal

of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The representation outlining reasons against development in Pyrford have also previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding the representation on infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the

impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. The Martyrs Lane site is currently used for a number of uses including the Martyrs Lane Recycling Centre and the New Zealand Golf Course as well as several private residential properties.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is considered that all of the proposed safeguarding sites, including Martyrs Lane, would be economically viable for residential development. There is therefore no advantage for the Martyrs Lane site on this particular matter.

**Contributor Reference:** 02545/1/001  
**Customer Name:** Ms Linda Kemeny

**Summary of representation:**

The site is large enough to accommodate the known housing requirement plus necessary infrastructure without development of the New Zealand Golf Course.

This area could support a single development location rather than spreading the release of green belt in different areas across the borough.

It is close to major transport links, including the M25, A320, A3, Heathrow Airport and easy railways links to Guildford and Waterloo. The other sites in northeast and southwest Woking have poor surrounding infrastructure and road connectivity. The A320 between Woking Town Centre and the M25 could also be more easily widened. Far fewer existing residents will be affected by development.

Planning approval has already been given for McLaren on the site. This land is largely scrub land in appearance with little in the way of attractive features, unlike some of the earlier proposed sites which are of natural beauty such as the Hook Heath Escarpment.

Support the Martyrs Lane proposal.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation about the

Hook Heath Escarpment. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

**Contributor Reference:** 02546/1/001  
**Customer Name:** Mrs Sarah Elaine Alexander

**Summary of representation:**

Object to development in Pyrford.

The road network in Pyrford near the school is at capacity and dangerous. Development will make the situation worse.

Development will also spoil the character of the village.

Martyrs Lane site would be a better option. Pyrford fields are used for agriculture and contain footpaths. There are no footpaths near the Martyrs Lane site and it will impact far fewer people.

A single site at Martyrs Lane will provide greater economy of scale to address the many infrastructure issues.

The site is partly derelict and unused by the public.

**Officer Response:**

Objection to development in Pyrford and support for Martyrs Lane is noted.

The representation against developing in Pyrford has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding infrastructure provision generally, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02548/1/001  
**Customer Name:** Mr Peter Ferguson

**Summary of representation:**

Concerned about the destruction of Green Belt and development destroying local character and valuable green spaces. High density development would also be out of keeping with this part of Woking.

Development would result in the loss of an important historic golf club.

**Officer Response:**

As set out in Section 1.0 and 2.0 of the Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established in the Core Strategy and is consistent with national policy. Although the Council accepts that any land taken out of the Green Belt will lead to a reduction of the amount of Green Belt land in the borough, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. The total amount of land proposed to be released from the Green Belt to meet development needs up to 2040 is about 3.5% and therefore the amount being proposed is relatively modest.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

Regarding the loss of the New Zealand Golf Course, if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes. In addition the Council has consulted with Sport England during the consultation and their comments will be assessed and considered as part of the process.

**Contributor Reference:** 02425/1/001  
**Customer Name:** Mr And Mrs Denis And Kathleen Chia

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02428/1/001  
**Customer Name:** Mr Chris Sears

**Summary of representation:**

Agrees to the Martyrs Lane proposal.

If there is no choice in building 1024 homes locally then this site would have far less impact than the other sites.

The proposed new development of over 200 dwellings in West Byfleet should be used against the 1024 dwellings.

The loss of Green Belt is a shame but the loss of the fields in Pyrford would be unforgivable. They have pleasant views towards the Surrey Hills.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

The Council is fully committed to the comprehensive delivery of the Core Strategy which seeks to deliver 4964 dwellings as well as a significant amount of retail and commercial floorspace between 2010 and 2027. The purpose of the Martyrs Lane consultation is to inform the Council's decision on its preferred safeguarding option. This would be to ensure the Council has sufficient land to meet development needs for the next plan period, between 2027 and 2040. The Martyrs Lane consultation anticipates that the site can deliver at least 1200 dwellings and therefore is broadly similar to the cumulative capacity of the six original sites.

Regarding the impact of development on the local area, this is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Although the representation regarding 200 units is not site specific, it should be noted that any recent planning application or permission will help to deliver the housing requirements of the Core Strategy. As set out above, this is for 4964 dwellings up to 2027. The purposes of safeguarding land for future development needs is to ensure the Council is able to meet its housing requirements for the next plan period. Therefore the 200 units highlighted in the representation can not be discounted from the amount of development or safeguarded land required for the next plan period.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is

consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The representation highlighting reasons against development in Pырford has also been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02432/1/001  
**Customer Name:** Mr Keith Armstrong

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

The road adjacent to Pyrford School is dangerous and development will make the situation worse.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for

safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the

safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and

jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

As set out above, the Council is working with the County Highways Authority to identify the impacts of development on the road network and the necessary mitigation measures required to make the development acceptable. This would also be carefully considered at the Development Management stage for any of the proposed allocated or safeguarded sites in the Site Allocations DPD.

**Contributor Reference:** 02435/1/001  
**Customer Name:** Mrs Madeleine Key

**Summary of representation:**

Writing to reinforce the argument for replacing the current proposed 6 sites with the Martyrs Lane development.

It is the best opportunity for development as all housing requirements could be met on one site that has accessibility to the M25 and Woking. It will also have the least disruption to local communities.

Surely the arguments against development on the other sites including the financial costs of development would be outweighed by using one single site with a partial history of development.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Regarding the anticipated capacity of the site, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered.

In making a decision on its preferred Green Belt sites for allocation and safeguarding the Council has to ensure that the sites selected are the most sustainable compared to all reasonable alternatives. The Council also has to ensure that its preferred sites will not undermine the overall purpose and integrity of the Green Belt. These decisions will need to be supported by robust evidence.

**Contributor Reference:** 02448/1/001  
**Customer Name:** Mr Chris Dunstan

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02468/1/001  
**Customer Name:** Ms Fiona Dunstan

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02523/1/001  
**Customer Name:** Ms Juliet Moulin

**Summary of representation:**

Awful idea. Will result in the loss of Green Belt land and put pressure on local services and infrastructure. It will also involve the loss of wildlife and woodlands.

Oppose the proposal.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation highlighting reasons against development at Martyrs Lane has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02525/1/001  
**Customer Name:** Mr Stephen Lloyd

**Summary of representation:**

Awful idea. Will result in the loss of Green Belt land and put pressure on local services and infrastructure. It will also involve the loss of wildlife and woodlands.

Oppose the proposal.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation highlighting reasons against development at Martyrs Lane has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02527/1/001  
**Customer Name:** Mr Luke Lloyd

**Summary of representation:**

Awful idea. Will result in the loss of Green Belt land and put pressure on local services and infrastructure. It will also involve the loss of wildlife and woodlands.

Oppose the proposal.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation highlighting reasons against development at Martyrs Lane has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02529/1/001  
**Customer Name:** Ms Lucy Lloyd

**Summary of representation:**

Awful idea. Will result in the loss of Green Belt land and put pressure on local services and infrastructure. It will also involve the loss of wildlife and woodlands.

Oppose the proposal.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation highlighting reasons against development at Martyrs Lane has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02526/1/001  
**Customer Name:** Mr Ben Carasco

**Summary of representation:**

Objects to the Martyrs Lane proposal.

The key principle behind the concept of Green Belt is the prevention of urban sprawl. The Martyrs Lane site provides a valued green buffer between the northern side of Woking and settlements beyond. The proposal would extend the urban area significantly and would be in direct contradiction of the purposes of Green Belt.

The other sites have some existing spare infrastructure capacity and would be able to absorb a relatively small population increase compared to a single site with no existing facilities. Martyrs Lane would require significantly more investment.

The road network, including the A320 and A245 are at capacity and Surrey County Council studies show that the Six Crossroads Roundabout and the roundabout at the end of Sheerwater Road are major congestion hotspots. Even if development was limited to 1200 units, the traffic impact would be significant.

This consultation should be seen in the context of the overall Borough social and economic policy. Good road communications are vital for maintaining Woking's attractiveness for businesses and investment. The A320 is a vital link to the M25 and the national road network. Martyrs Lane would have a significant adverse impact on this link and therefore on the local economy.

The Sheerwater Regeneration Scheme is in close proximity and local residents would be subject to two significant developments. Fairness would demand a greater spread.

Horsell Common is a highly valued amenity by all residents and objections raised by Horsell Common Preservation Society are compelling and supported.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The representation regarding urban sprawl and the purposes of Green Belt, the provision and funding of infrastructure to support development and the impact of the Martyrs Lane proposal on the existing road network have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The economic impacts of development at all of the proposed sites have been considered by the Council as part of the Sustainability Appraisal. This is on the Council's website and will form

part of the evidence that will inform the Council's decision on its preferred safeguarding option.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater. This is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure.

The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding. This may not necessarily result in an even spread of development across the borough.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The representation submitted as part of the consultation by Horsell Common Preservation Society will be considered and addressed separately.

**Contributor Reference:** 02533/1/001  
**Customer Name:** Mr Douglas Elbourn

**Summary of representation:**

Support the Martyrs Lane proposal.

There would be economies of scale from developing on a single site.

Fewer residents would be impacted by any necessary development, and the semi-rural character enjoyed by the other sites, and crucial to Woking's localities, would be preserved.

The Martyrs Lane site is served by public transport, which would mitigate the increased traffic from the development.

The site provides better access to local businesses, employers, commuter links and Woking town centre.

Planning permission has already recently been granted for part of the site.

Development could take place without having to utilise the part of the site occupied by the New Zealand Golf Course.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites. It should be noted that the overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs

Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

**Contributor Reference:** 02534/1/001  
**Customer Name:** Ms Hilary Cheetham

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs.

Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land

classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 03022/1/001

**Customer Name:** Gladman Developments Limited

**Summary of representation:**

The proposal represents an unsound approach. The DPD must meet the four tests of soundness:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

The Council commissioned a Green Belt boundary review to recommend sites to be removed from the Green Belt. Land to the east of Martyrs Lane was assessed as part of a wider review and the report concluded that it is not appropriate for the site to be released from the Green Belt. The proposed change of direction cannot be justified against this evidence base; and the proposed allocation of sites would not be considered consistent with national policy (paragraph 85 of the NPPF provides guidance on Green Belt boundaries, against which the Green Belt review was conducted).

The level of safeguarded land being proposed is insufficient to ensure that the new boundaries can take on a permanent nature without reliance on further Green Belt release for the next plan period; thus conflicting with para.85 of the NPPF regarding Green Belt reviews.

The proposal would result in the DPD not being positively prepared or effective. Reliance on one large site to deliver housing beyond the plan period is not sufficiently effective or a positive approach to meeting future development needs. Further release of safeguarded land is needed (rather than a substitution) as the full Objectively Assessed Need (OAN) is not currently being addressed; and a change of circumstances regarding housing could occur e.g. with new government policy. Failure to safeguard sufficient land to ensure the full OAN can be met is likely to result in a worsening of affordability in Woking and pressure on the Green Belt for further release.

The Council cannot justify how the proposal is the best option when considered against the reasonable alternatives. Evidence demonstrates that the land would not be able to accommodate significant change without significant adverse effects on the landscape pattern and features; and it would leave an area of development unconnected to the urban area. It would make a significant incursion into the Green Belt, with only very limited impact on the Council's ability to deliver new housing. Disregarding these conclusions would be unjustified. The Council stated in responses to the Regulation 18 consultation that allocations in the DPD were the most sustainable when compared against the reasonable alternatives; and that no other sites could be identified in the Green Belt for development purposes without significant damage to its purpose and integrity. Gladman would ask what has changed that results in this no longer being the case. New evidence would need to be brought forward demonstrating the

proposal is also a sustainable option for Green Belt release, and that it wouldn't damage the purpose and integrity of the Green Belt.

If justification is available to support the release of land at Martyrs Lane, it should be taken forward in addition to the safeguarded sites.

**Officer Response:**

Objections are noted.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document, and as cited in the representation, will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The inclusion of the golf course in the proposal would effectively ensure that any proposed development would be connected to the urban area, and solve the problems highlighted in earlier assessments whereby development of northern parts of the site would lead to an area of development unconnected to the urban area (as cited in the representation). However, the conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to a degree of urban sprawl and a potential

perception of towns merging. Officers have also noted the conclusion of the report regarding the contribution that the site makes to overall landscape character of the area and agrees with the representation. These considerations would be two of a number of material considerations that the Council has to take into account in making its decisions about the preferred approach to safeguarding.

It is, however, important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors. Further detail on this issue is given in Section 10 of the Duty to Cooperate Bodies Topic Paper.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites came about due to a change of circumstances with land owned by McLaren since the publication of the Regulation 18 version of the DPD. This is set out in detail in Sections 3 and 5 of the Duty to Cooperate Bodies Topic Paper. This significant change of circumstances that was not previously considered justified the testing of this land in combination with other adjacent sites – including the golf course – as a reasonable alternative. The LDF Working Group gave clear reasons why the land should be identified for consultation, and this is documented and available on the Council's website. In order to comply with paragraph 182 of the NPPF, and therefore be consistent with national policy, it would have been irresponsible of the Council if it did not at least consider the proposal as a reasonable alternative in light of the change in circumstances regarding the land in the ownership of McLaren. The consultation document includes a list of some of the evidence base used to inform the Council's decision on the matter, but it should also be noted that the representations received on the consultation are also a relevant source of information.

Section 1 of the Duty to Cooperate Bodies Topic Paper sets out in detail the Council's response to the suggestion that the Martyrs Lane site should be brought forward to meet current unmet housing needs, and whether it should consider allocating the land in addition to the original six safeguarded sites. Section 4 of the Topic Paper also explains how the Council is satisfied that the housing requirement is unlikely to change significantly; and how it may even come down in the future. The Council is confident that its preferred approach will not jeopardise the delivery of affordable housing or affordability in general, nor put pressure upon the Green Belt for further release, and will be consistent with national policy.

For the Site Allocations DPD to be found sound, the Council has to identify the most sustainable land to meet its future development needs. This must be the most sustainable when compared with all other reasonable alternatives. A lot of studies have been undertaken to enable the Council to make an informed decision on this matter. The spatial distribution of development is therefore driven by sustainability and not whether a single, large site or multiple sites are identified. The Council is satisfied that a reliance on one large site to deliver its future housing need would not make the plan ineffective or be considered a negative approach towards meeting future development needs of the area.

The Council does not disagree that it made the statements cited in the representation. Section 5 of the Duty to Cooperate Bodies Topic Paper provides a detailed response to this issue.

Paragraph 182 of the NPPF requires the Council to submit a Site Allocations DPD for Examination that it considers is sound. That is exactly what the Council will do and this will minimise any risk of the DPD being found unsound. In particular, the Council would only safeguard land that it considers are the most sustainable based on proportionate evidence when compared against other reasonable alternatives.

**Contributor Reference:** 02404/1/001  
**Customer Name:** Mr Scott Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02371/1/001  
**Customer Name:** Mr Chris Newell

### **Summary of representation:**

On balance, despite all sites being in the Green Belt, supports the proposal, excluding the golf course.

- o The top part of the site was recently granted planning permission
- o There is currently no public access to the land
- o A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools, possibly social housing, GP surgeries, traffic volumes, waste water, etc.
- o The northern part of the site is well served with public transport, unlike the other six sites
- o The northern part of the site has access to the A320 via a roundabout, with its direct road links to the M25 and to Woking town centre
- o The northern part of the site is close to major local employers, like St Peter's Hospital and the Animal & Plant Health Agency
- o Much of the northern part of the site has already been used for non-agricultural purposes
- o Part of the northern part of the site is publicly owned land, so the sale would help council tax payers
- o Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites.

### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without

the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations

DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02375/1/001

**Customer Name:** Ms Fiona Bell

**Summary of representation:**

Objects to the proposal.

Access to M25 and onto M3, M4 and A3 would be adversely affected – additional traffic cannot be accommodated.

It's a wet area – flooding is a concern.

Woking/West Byfleet train services would be overloaded – there are no seats. Woking would become a less attractive area to live.

Would be disappointed to see Woking's decline.

**Officer Response:**

Objections are noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses these issues in detail, including traffic impacts; flood risk assessment; and infrastructure provision and improvements.

The Council is currently updating its Infrastructure Delivery Plan to reflect the preferred sites in the draft Site Allocations DPD. If this site were allocated for safeguarding, the Council would work with railway infrastructure providers and train operators to ensure that an adequate service is provided taking into account future housing growth.

**Contributor Reference:** 02378/1/001  
**Customer Name:** Mr Nick Forde

**Summary of representation:**

Objects to the proposal.

Unnecessary loss of Green Belt land in an area of important woodland and conservation. Would result in urban sprawl (particularly with Fair Oaks development), and loss of character in this area due to high density housing.

Lack of capacity in road infrastructure – demonstrated by the recent road works causing congestion. This will decrease connectivity to M25 and beyond.

Woking would therefore become less attractive to live and work in.

**Officer Response:**

Objection is noted.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail the justification for the release of Green Belt land (see Sections 1 and 2).

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses the issues raised in the representation in detail, including: assessment of the land for Green Belt purposes and likelihood of urban sprawl and loss of character; impacts on woodland and biodiversity; infrastructure provision, including transport infrastructure; and traffic impacts.

It should be noted that the Development Plan for the area contains robust design policies which would require development proposals to respect and make a positive contribution to the character of the area in which they are situated. There are also policies which provide indicative density ranges, which are appropriate to the area and ensure that densities do not affect the quality and character of an area and the general well-being of residents.

The Council is working in partnership with the County Council and neighbouring boroughs to explore and determine development impacts of proposed sites, including the Fair Oaks proposal. This work is on-going as part of the Council's Duty to Cooperate, and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 02383/1/001  
**Customer Name:** Ms Marian Bendle

**Summary of representation:**

The site is big enough to accommodate 1200 houses, including affordable housing, and the necessary infrastructures of shops, primary schools, health centre etc., without encroaching on the golf course.

There are advantages in the creation of a single new housing estate rather than several dispersed small ones. It is much easier to create the associated infrastructure rather than overloading existing over stretched facilities.

It will also simplify the process for obtaining planning permission.

The A320 gives easy access to the M25 and Heathrow Airport, and to Woking town centre and mainline railway station to the south without encountering the traffic delays were roads cross railway lines. Bus lanes and cycle lanes to Woking town centre, exist already. This is a better proposal than the option of building south of Woking where the Main road is often congested.

**Officer Response:**

Support is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300

dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served

by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 02388/1/001  
**Customer Name:** Ms Anne Smith

**Summary of representation:**

Objects to the proposal as the land is critically important in checking urban sprawl and safeguarding the countryside.

One huge site would have an impact on infrastructure – better to have several smaller sites.

It would necessitate the use of a car to travel to local facilities e.g. doctor surgery, schools, shops, playgrounds – on already busy and congested roads.

Parts are subject to flooding.

The site was not recommended in the Green Belt boundary review, nor given Officer support.

**Officer Response:**

Objection is noted.

The Woodham and Horsell Issues and Response Topic Paper sets out in detail a response to the issues raised, including likely impact on urban sprawl and integrity of the Green Belt; infrastructure provision and accessibility to local facilities; traffic impacts; and flood risk assessment.

It also sets out the reasons behind the consultation and the justification for it.

**Contributor Reference:** 02389/1/001  
**Customer Name:** Ms Teresa Bacon

**Summary of representation:**

Prefers this proposal as the environmental impact is less severe than developing six separate sites across the Borough.

Easier to serve a single site with required infrastructure e.g. road access towards M25, GP surgeries, schools; rather than squeeze substantial pockets of development into areas with overstretched facilities.

Easier to meet affordable housing and social housing requirements.

Currently lacks public access.

Parts are semi-derelict.

The other sites are widely used by residents and its loss would be felt more widely.

There would be less disruption to the general public during the development phase if only one area of Woking was involved.

**Officer Response:**

Support is noted. The merits of the proposal as set out in the representation will weigh in the balance of considerations by Members.

It is not envisaged that the development of any of the site options would compromise the environment or lead to impacts which cannot be satisfactorily mitigated. The Development Plan for the area has robust policies to make sure that development proposals contribute to the enhancement of existing biodiversity and geodiversity features, and explore opportunities to create and manage new ones where it is appropriate. Any development that is likely to have a potentially harmful impact or lead to a loss of features of interest for biodiversity would be refused.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council is working with infrastructure providers as part of its work to update the Infrastructure Delivery Plan to ensure that capacity in existing infrastructure is sufficient to accommodate new housing; and if not, to provide new infrastructure accordingly.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is correct that some of the land within the Martyrs Lane site contains existing semi-derelict structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition,

development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02390/1/001  
**Customer Name:** Mrs Nora Goodman

**Summary of representation:**

Objects to the proposal.

Queries the point of consultations. Has asked if any of the 32,712 representations to the Regulation 18 consultation exercise resulted in any modifications, but has received no answer. Queries whether consultations are just box-ticking exercises.

The development would result in a new town, causing congestion on roads which are at maximum capacity. There is too little parking in West Byfleet, including at the station, to accommodate more cars in this area. Cars frequently park in roads to the detriment of the residents. Where will new residents park if they wish to shop in West Byfleet, also taking into consideration the Sheer House development?

The development would require huge investment in infrastructure and services.

There is too much development planned on Green Belt in this area of the Borough.

**Officer Response:**

Objection noted.

The Council has carefully considered and responded to each of the Regulation 18 consultation representations, and its response is available on the website. As a result of the consultation exercise, over 100 modifications have been made to the next iteration of the draft Site Allocations DPD thus far. These will be available to comment on at the next consultation stage: 'Regulation 19' consultation. The Council believes consultation responses make a valuable contribution to the evidence base for the preparation of Development Plan Documents.

The issues raised in the representation concerning traffic impacts (including those in West Byfleet), infrastructure provision (including public transport) and likely impacts on the Green Belt are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Transport studies undertaken by the Council confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development. Examples of mitigation measures

might include providing/improving public infrastructure in the area, to reduce travel by car and subsequently reduce the need for parking.

Whilst the Council sympathises with the concerns of local residents over the loss of Green Belt in the West Byfleet area, it has ensured through a number of studies that any land released from the Green Belt will not undermine its overall purpose and integrity. It is important that development is directed to the most sustainable locations of the Borough when compared with reasonable alternatives, and it is within this broad spatial strategy context that sites are allocated for development. The spatial distribution of development is driven by sustainability and not by Ward boundaries .

The objections to the proposal as put forward in the representation are noted and will weigh in the balance of considerations by Members.

**Contributor Reference:** 02391/1/001  
**Customer Name:** Ms Yvette Bolton

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes, and taking into account the more reasonable cost of this land.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will

only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02393/1/001  
**Customer Name:** Mr Nicholas Miller

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02396/1/001  
**Customer Name:** Mr Ian McLellan

**Summary of representation:**

Supports the proposal, excluding the golf course, in favour of developments in Pyrford.

A single site is preferable due to economies of scale and potential to provide community services such as health centre, school and affordable housing.

**Officer Response:**

Support is noted, and the merits set out in the representation will weigh in the balance of considerations by Members.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the

Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02397/1/001  
**Customer Name:** Mrs Leonora Humphreys

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part contains previously development land.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming

the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is

specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land

classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02398/1/001  
**Customer Name:** Ms Gillian McLellan

**Summary of representation:**

Supports the proposal, excluding the golf course.

It will provide greater economies of scale and can allow for additional community services such as health centre, school and affordable housing.

**Officer Response:**

Support is noted, and the merits set out in the representation will weigh in the balance of considerations by Members.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the

Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02400/1/001  
**Customer Name:** Mr Tom Leader

**Summary of representation:**

Support the Martyrs Lane proposal excluding the New Zealand Golf Course. Difficult as all are in the Green Belt, however, overall impact on countryside, amenity, transport infrastructure, ecology and environment would be considerably less if Martyrs Lane site were safeguarded, particularly in favour of pristine Green Belt around Pyrford.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land, reducing public amenity impact. This 'infill' land is also surrounding by busy, existing urban environment and infrastructure, therefore green belt impacts are less than the alternatives.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre, and road network is better able to cope with traffic.

It is close to major employers and previously developed for non-agricultural purposes (rather than the pristine agricultural land in Pyrford).

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by construction at one site then by six individual sites.

Reduced visual impact as the site is visually low profile and well hidden.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted, and merits as put forward in the representation will weigh in the balance of considerations by Members.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will

only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites, including those in Pyrford, are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Although it is acknowledged that the site is screened by mature vegetation and borders on some sides from the existing urban area, the Council must consider the overall impact on the integrity of the Green Belt and landscape character if the site were safeguarded. The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, it could be considered that development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt. The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and

associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition,

development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

**Contributor Reference:** 02401/1/001

**Customer Name:** Mr Peter Hill

**Summary of representation:**

Supports the Martyrs Lane proposal, in favour of retaining Green Belt status of original sites.

Agrees with Hook Heath Residents' Association's submission to the consultation.

Safeguarding the originally proposed sites would put unacceptable pressure on already inadequate infrastructure.

The site is large enough to accommodate 1200 homes, including affordable housing, and the necessary infrastructure. There are opportunities to 'master plan' development, whilst taking into account the wishes of the local community (provided they are encouraged to participate).

There are major employers close by.

The site has no national or local landscape designation unlike the other sites.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

**Officer Response:**

Support for the Martyrs Lane site is noted, and the merits of masterplanning a single site as put forward in the representation are noted and will weigh in the balance of considerations by Members.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites. The Development Plan for the area contains robust design policies which would apply equally to the Martyrs Lane site and original six sites, as they are all of a scale which would enable effective masterplanning, with community involvement.

The Council has responded to the Hook Heath Residents' Association representation separately, and is available to view.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary

infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council is currently updating its Infrastructure Delivery Plan, working with infrastructure providers to ensure there is capacity in existing infrastructure to support future housing development as envisaged in the draft Site Allocations DPD, and if not, that adequate infrastructure is planned for.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the

representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

**Contributor Reference:** 02403/1/001  
**Customer Name:** Mr Kendeep Ruhomon

**Summary of representation:**

Objects to the planned development of Woodham New Town.

**Officer Response:**

Objection noted.

**Contributor Reference:** 02512/1/001  
**Customer Name:** Anthony's Resident Association

**Summary of representation:**

Object to the proposal on following grounds:

Loss of Green Belt;  
Urban sprawl and Fair Oaks;  
Flood Risk;  
Transport – Roads;  
Transport – Public;  
Achieving sustainable development;  
Infrastructure;  
Wildlife;  
Woodlands;  
Flight path.

Support the points in the letter submitted by the Horsell Common Preservation Society.

**Officer Response:**

Objection is noted. The issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council has considered and responded to the Horsell Common Preservation Society representation separately, which can be viewed for further details.

**Contributor Reference:** 02363/1/001  
**Customer Name:** Mr Martin Scott

**Summary of representation:**

Supports the proposal as it is between well-connected roads and it is not on virgin Green Belt land (unlike that at Upshot Lane).

**Officer Response:**

Support is noted.

Although the Martyrs Lane site is located near to well-connected roads, the traffic impacts on these roads must be taken into account. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

With regards to the impact on Green Belt land: the Green Belt boundary review (by Peter Brett) assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

**Contributor Reference:** 02364/1/001  
**Customer Name:** Mr Patrick Bennett

**Summary of representation:**

Supports the proposal in favour of destroying productive agricultural land in Pyrford. Better to exploit derelict land near the dump, and encroach upon the ugly and sterile pine woodlands north of the canal.

The Stop Woodham New Town campaign seems somewhat hysterical.

**Officer Response:**

Support is noted.

It is correct that some of the land within the Martyrs Lane site contains existing derelict structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites, including those in Pyrford, are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The opinion relating to the ugly and sterile nature of the land are noted. However, the Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green

Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors. Other sections of this Issues and Matters paper address some of these other factors in detail.

**Contributor Reference:** 02369/1/001  
**Customer Name:** Mr And Mrs H S Conway

**Summary of representation:**

Support the proposal, excluding the golf course, and with concern about the increased congestion it will cause on surrounding roads and amenities.

1. Previously developed land. The Martyrs Lane site is on Green Belt land, some of which has been previously developed – which is not true of the other proposed sites.
2. Infrastructure. The A245 through West Byfleet and over the M25 bridge has no spare traffic density capacity left, especially when other new developments in the area are taken into account.
3. Developing one site for the future housing needs of Woking would probably mean economies of scale and would help solutions to local infrastructure concerns.
4. Amenity value – Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.
5. Heritage – the heritage features of the area around the two Pyrford fields include the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a SNCI, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area.
6. Landscape. Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.
7. Agriculture. Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

**Officer Response:**

Support is noted.

The merits of the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs.

Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

Although some parts of the land are previously developed, the sites are still washed over by the Green Belt designation. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. Peter Brett's Green Belt boundary review report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land (if the Golf Course were not included) would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The conclusion of both studies demonstrate that, despite parts of the site being previously developed, the area makes an important contribution to the purpose of the Green Belt – the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

The Council has worked in partnership with Surrey County Council to study the traffic implications of the various development options. The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of

development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, as expressed in the representation, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Whilst the Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA, including those in Pырford. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features and locally valued landscape features such as footpaths within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage and landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are situated.

**Contributor Reference:** 02372/1/001  
**Customer Name:** Ms Caroline Scannella

**Summary of representation:**

Objects to the proposal.

New homes should be sustainable within the borough without placing all of the burden on a single ward. Using several sites over the borough would be far more sustainable and have less overall impact on the borough infrastructure facilities.

Completely agrees with Woodham and Horsell residents' association objections on all grounds.

**Officer Response:**

Objection is noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper sets out in detail the Council's response to issues raised in the representation, including directing development onto a single site, in a single ward, and provision of infrastructure.

**Contributor Reference:** 02374/1/001  
**Customer Name:** Mr Salvatore Scannella

**Summary of representation:**

Objects to the proposal.

New homes should be sustainable within the borough without placing all of the burden on a single ward. Using several sites over the borough would be far more sustainable and have less overall impact on the borough infrastructure facilities.

Completely agrees with Woodham and Horsell residents' association objections on all grounds.

**Officer Response:**

Objection is noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper sets out in detail the Council's response to issues raised in the representation, including directing development onto a single site, in a single ward, and provision of infrastructure.

**Contributor Reference:** 02379/1/001  
**Customer Name:** Mrs Christine Griffiths

**Summary of representation:**

Supports the proposal, excluding the golf course.

Reasons in support of the designated Martyr's Lane site are:

The top part of the site includes pre-developed land used as a wartime army camp; and now derelict; this area was also recently granted planning permission for a technology centre;

A single site would offer economies of scale with regard to the infrastructure issues arising from the building of more homes, and there would be less disruption for Woking residents;

The northern part of the site is well served with public transport unlike the other six sites;

The northern part of the site has access onto the A320 with road links to the M25 and Woking town centre. There are therefore good links for commercial and employment purposes to the towns in Runnymede, Elmbridge and Spelthorne boroughs.

Development at Martyrs Lane would save further congestion in Woking town centre and prevent even more overload on the Parvis Road/Byfleet Road route which has already reached saturation point, soon to be added to by the planned developments in the adjacent areas in West Byfleet/Byfleet.

**Officer Response:**

Support noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs.

Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25, and also on the A245 Woodham Lane/Sheerwater/Parvis Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts, including from those in adjacent areas such as West Byfleet/Byfleet. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02354/1/001

**Customer Name:** Ms Rosie Whetstone

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02357/1/001  
**Customer Name:** Mr Leon Caszo

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02358/1/001  
**Customer Name:** Ms Francesca Duke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00491 / 1 / 001  
**Customer Name:** Ms Marilyn Higham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02366/1/001  
**Customer Name:** Mr Sebastian Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02367/1/001  
**Customer Name:** Mr Dave Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02368/1/001  
**Customer Name:** Ms Penny Merritt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02377/1/001  
**Customer Name:** Ms Henrietta Brooks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02380/1/001

**Customer Name:** Ms Zoe Carlin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02381/1/001  
**Customer Name:** Mr Matt Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02384/1/001  
**Customer Name:** Mr Keith Steer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02386/1/001  
**Customer Name:** Ms Christine Riggs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02387/1/001  
**Customer Name:** Mr Christopher Riggs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02392/1/001  
**Customer Name:** Ms Karen Prenczek

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02394/1/001  
**Customer Name:** Ms Margaret Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02370/1/001  
**Customer Name:** Ms Heather Mustard

**Summary of representation:**

Objects to Green Belt land release in favour of brownfield development, but recognises requirement for a Green Belt review and land to the east of Martyrs Lane demonstrates a number of benefits:

- lack of national or local landscape designations;
- significant portion disused and derelict and planning permission has historically been granted for McLaren;
- size of site allows WBC to meet its housing needs to 2040 with ease: site could accommodate 1200 houses including affordable housing with supporting infrastructure such as a primary school and local shops; such diversity of housing with integrated infrastructure could not be achieved on several dispersed smaller sites.
- site near major employers including St Peters Hospital, McLaren Technology Centre. The Animal and Plant Health Agency. The growth of a new community on this site would provide additional local employment opportunities.
- well served by transport links with easy access to the A320, the M25, a railway station at nearby West Byfleet and bus and cycle links.
- it provides a unique planning opportunity for WBC to create a sustainable community that meets the housing needs of the borough from 2027 onwards.

**Officer Response:**

Support for Martyrs Lane is noted, and the merits of the proposal as set out in the representation will weigh in the balance of considerations by Members.

The Regulation 18 Consultation Issues and Matters Topic Paper describes in detail the justification for releasing Green Belt land (see Sections 1 and 2), and how brownfield land has been prioritised (Section 11).

Regarding the representation on landscape designations, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future

development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their location and size. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy

that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 02444/1/001  
**Customer Name:** Taylor Wimpey UK Ltd

**Summary of representation:**

Do not support the proposal to safeguard the site to the east of Martyrs Lane in place of the sites identified for safeguarding within the Draft DPD. The main concerns relate to the following issues:

Fundamental concerns over the prospects of site availability and therefore the developability of the site as a whole. There are also concerns over its ability to achieve the level of housing assumed by the Council.

It is widely known that the owners of the New Zealand Golf Club have no intention whatsoever to sell their land for development and understand that they have asked the Council to exclude their land from the site area. There is no evidence that the Club will change their views and therefore would render the proposal undeliverable. The Site Allocations DPD would be unsound and would also undermine the objective of achieving certainty and permanence for Green Belt boundaries which the Council has stated is fundamental to the long-term development strategy of the local plan.

Given the availability of reasonable alternative Green Belt Sites for safeguarding, there is no scope for the Council to use Compulsory Purchase Powers to acquire the Golf Club. Equally, given the location and extent of the Golf Club, there is no possible justification for seeking to focus any future development on the land to the north of the Golf Club. This approach would amount to inappropriate and unsustainable development, isolated within the countryside and not represent a sound basis for safeguarding for the borough's long term development needs.

The proposal therefore fails the test of being a developable site as defined by Footnote 12 of the NPPF. The importance of the availability of sites is also set out in the Council's Regulation 18 consultation Issues and Matters Topic Paper.

Even if the New Zealand Golf Course position were to change, there is uncertainty over the suitability of the Martyrs Lane site and would make for a much less suitable site for safeguarding compared to the alternative sites in the draft Site Allocations DPD, in particular the sites to the south of Woking and to the north and northwest of Mayford.

The Martyrs Lane site was assessed as part of the Green Belt boundary review report as Parcel 2. Within the main assessment of the parcel it is clear that the previously permitted, and now revoked, planning permission for McLaren was material to the assessment and is likely to have influenced the assessment outcome for Green Belt purposes 1 and 2 in particular. This is a significant change in the way in which Parcel 2 can be expected to perform against the main Green Belt purposes and consider that it is essential that the Parcel is reassessed in light of the decision to revoke the planning permission. Without this accurate assessment, it is not possible to conclude how Parcel 2 performs relative to the other parcels in the report.

The landscape character and sensitivity to change assessment in the report clearly demonstrate that Parcel 2 should not be released from the Green Belt. It also states that any further significant development would have significant adverse impacts on the landscape character. Allowing for the need to reassess the Parcel as stated above, the conclusions from the report are clear and it is therefore difficult to see what justification the Council has in now seeking to substitute this site for the original six sites.

The site has very significant potential to contain protected habitats and species and other features of ecological note. There is concern that the proposal is likely to lead to a significant adverse impact on the Thames Basin Heaths SPA to the west of the site at Horsell Common. This could be caused by recreational disturbance and potentially reductions in air quality or a combination of the two. The Habitats Regulations Assessment which accompanied the Martyrs Lane consultation, side stepped the issue and assumed that the process of HRA screening for the site could be postponed until the review of the Core Strategy or Site Allocations DPD. This is not justified or appropriate given that the whole purpose of safeguarding is to provide certainty as to the long term location of development and consequently provide a permanent Green Belt boundary.

Based on the above, it is therefore uncertain whether it will be possible to mitigate the impact of the substantial level of development proposed for the site. For example, whilst it would be possible to avoid developing within the 400m SPA Exclusion Zone, a significant number of new homes within walking distance of Horsell Common is likely to result in significant recreational disturbance, irrespective of the provision of additional on-site SANG capacity.

From visitor research in 2012, Horsell Common is identified as one of the most frequently visited sites across the entire Thames Basin Heaths SPA. It seems unlikely that the provision of onsite SANG would be capable of diverting a sufficiently high proportion of the additional recreation disturbance to avoid adverse effects on the SPA. Following the 'precautionary principle' required by the Habitats Directive 1992 and saved policy NRM6 of the South East Plan, it is considered that additional evidence to support the updated HRA should be sought now to inform the emerging Site Allocations DPD.

There is no justification to remove the original six safeguarded sites from the Site Allocations DPD. These sites were all duly assessed by the Green Belt boundary review, in accordance with the process established in the Core Strategy, and were found to be suitable for release from the Green Belt and capable of contributing to the long term development needs of the Borough. This conclusion was also broadly supported by other evidence, including the Strategic Transport Assessment and the Council's Sustainability Appraisal.

It is therefore illogical and potentially irresponsible to now contemplate replacing these sites for the land to the east of Martyrs Lane.

The Green Belt boundary review recommended that Parcels 4, 6 and 20 would be suitable for releasing from the Green Belt and also stated that no other parcels would be suitable for removal from the Green Belt to accommodate new strategic development.

Despite the Council receiving a number of representations against the proposed sites in the draft Site Allocations DPD, in June 2016 it was clear in the consultation response topic paper that the Council stood by its evidence based process for the identification of Green Belt sites. The Council had every opportunity in the topic paper to explain why, having considered the various consultation responses alongside other evidence, that it wished to make a significant change of course in terms of safeguarding sites for delivering long term development. This highlights that the Martyrs Lane proposal is a matter of political preference by the Council and demonstrates that the Council is contemplating a grave and unwarranted departure from the evidence based process by which the Council was previously progressing the Site Allocations DPD.

Sites GB10 and GB11 are now no longer being proposed for safeguarding and will be retained within the Green Belt. Other than paragraph 1.9 of the Martyrs Lane consultation document which states that there were a number of consultation responses to the draft Site Allocations DPD, there is no clear justification provided for this change in approach.

South Woking has been identified as an appropriate and sustainable location for strategic development since the Draft Surrey Structure Plan (2002) which proposed up to 2000 homes as an extension south of Woking. The possibility of development in this part of the borough was also referenced in the South East Plan. This chronology confirms that Green Belt releases to the south of Woking should be a key focus of meeting longer term development needs.

The assessment of Parcel 20 of the Green Belt boundary review concluded that development would not cause a material reduction to the gap between the urban areas of Woking and Guildford and that the area was a genuinely sustainable location for future development. Whilst there were some landscape concerns, it was clear that the local landscape designation is not one that is substantiated through any published or ratified study. Support for safeguarding the land in Parcel 20 is also stated in the Council's Issues and Matters Topic Paper.

Based on the available evidence and supported by strategic plan making over a lengthy period of time, it is unjustified and perverse at this late stage to propose that these sites are not safeguarded for future development needs.

Concerned that the current artificially low annual housing target of 292 per year is leading to a chronic undersupply of housing within the Borough and wider housing market area. Also concerned that this long term annual undersupply of housing will make it considerably harder to resolve the shortfall when the Core Strategy is reviewed and the focus moves forward to the period ending in 2040.

Previous representations highlighted that the current housing target is too low as it was set before the Green Belt boundary review was undertaken and without reference to the potential for sites within the Green Belt to contribute to housing supply. The Green Belt boundary review has since provided clear evidence to support the release of several Green Belt parcels.

The updated SHMA (2015) identifies the Borough's OAHN which amounts to 517 new dwellings per year. Given the fundamental changes in the evidence base context, there is no longer any reasonable justification for maintaining the artificially constrained 292 dwellings per year target. Seeking to do so represents an unreasonable attempt to ignore the clear evidence that has emerged in the almost five years since the Core Strategy Inspector reluctantly accepted the current Core Strategy target as a minimum to be achieved in the absence of further evidence.

Based on the urgent need for more housing now, the decision to allocate some Green Belt sites and safeguard others was not justified within the Draft DPD and is certainly not justified under the proposals subject to the current consultation. The Council's approach to releasing Green Belt land to meet a minimum of 550 dwellings in this plan period indicates that there are no planning reasons why additional Green Belt sites cannot now be allocated to meet a higher proportion of need and comply with the NPPF requirements for flexibility.

Based on the above, the only reasonable option is to allocate the Green Belt sites GB10, GB11 and GB14 within the emerging Site Allocations DPD to contribute to readdressing the current housing shortfall.

Support the Council's commitment to identify Green Belt sites to be safeguarded for long term development needs but submit that the quantum of land proposed is woefully insufficient and has been based on deeply flawed assumptions.

Support the objectives of safeguarding land. However the failure to date to identify sufficient land for safeguarding to meet a portion of the housing needs to 2040 will inevitably require the Council to undertake a further Green Belt boundary review to seek additional release sites and will undermine the stated objective of the policy.

No concern with the assumption that 50% of future housing need to 2040 would need to be met through Green Belt release sites. It needs to be investigated further but is plausible in the absence of detailed work. Also content to assume that Green Belt sites could achieve an average of 30 dph. Reserve judgement on the assumption that 600 windfall homes may be assumed to assist in meeting housing needs to 2040 as the Core Strategy Inspector insisted that windfalls from small sites should not be counted towards future housing supply.

Greatly concerned by the assumption that the 292 dwelling target would continue up until 2040. It is an unjustified attempt to ignore both the NPPF and the Council's own evidence base. There is no evidence to support an assumption that future housing delivery should not be increased significantly to meet or at least attempt to meet the OAHN.

Even applying the Council's own unjustified assumptions, it is estimated that the level of housing supply over the 2027 to 2040 period that would need to be met from safeguarded sites would be c. 1640 dwellings. Even if the current safeguarded proposals, this would result in a deficit of 390 dwellings.

Any modest increases to any future housing target would result in a significant deficit in identified safeguarded land. Based on the assumptions set out in the representation, the amount of land proposed for safeguarding has not been appropriately identified. An additional Green Belt boundary review would therefore be necessary to identify further Green Belt sites.

Requests the Council to undertake the necessary work to identify a sufficient quantum of land to meet long term development needs. If the Council does not allocate sites GB10, GB11 and GB14 within the current plan period then these sites must be included within the sites safeguarded for future development needs.

The current consultation proposal provides a lack of clarity over site GB14. To gain greater certainty on the Council's intentions, seeking a meeting with Planning Policy to discuss how the site could contribute towards the Borough's future development needs. The site can be suitable for a mixed residential and green infrastructure scheme within the current plan period. Will provide the Council with supporting documentation shortly.

Appendix includes an assessment by Turley Sustainability comparing the sustainability of GB14 against the Martyrs Lane proposal. This includes a summary of the Council's Sustainability Appraisal of the two sites within the SHLAA and Site Allocations DPD Sustainability Appraisal. The assessment considers that by not assessing GB14 for residential purposes, it is a significant omission from the evidence base as it prevents a fair and objective comparison of all of the reasonable alternatives to ensure that the most sustainable options are identified to deliver future housing need. An SA of GB14 for residential uses is set out in the representation and states that it is a more sustainable option to meet future housing needs.

#### **Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The availability of the land will be a material consideration for its deliverability as highlighted by footnote 11 of the NPPF. It is acknowledged that if safeguarded, the land will be required for development between 2027 and 2040 and the NPPF highlights the prospect that the housing will be delivered on the site within five years. The New Zealand Golf Course has made representation to confirm that the Golf Course will not be made available for future housing development between 2027 and 2040. McLaren has also made representations to clarify that they do not object in principle to the safeguarding of the land to meet future development needs on condition that the part of the land in their ownership is allocated as a strategic employment site to meet the specific business needs of McLaren. Without both parcels of land, it would be unlikely that 1,200 new dwellings will be achieved on the site. This is a matter that the Council has to take into account when deciding its preferred approach to safeguarding. The ultimate goal that should drive the Council's decisions should be the need to achieve sustainable development and the robust evidence to justify its decisions. In this regard, if the Council decides on the available evidence that the Martyrs Lane site is the most sustainable when the available evidence has been considered, the lack of availability of parts of the land should not be an absolute constraint to the development of the entire land. The

Council has Compulsory Purchase Powers that it could use to acquire land, and the appropriate legal advice will be sought if necessary. In using the Compulsory Purchase Powers, Officers are aware that the availability of alternative sites will be a consideration. However the alternative sites should have to be in a more sustainable location for the Compulsory Purchase Powers application to fail. In this regard, the fact that alternative sites could be available on its own is insufficient to prevent the use of Compulsory Purchase Powers. In accordance with paragraph 182 of the NPPF, the Council will only submit a Site Allocations DPD for Examination that it considers sound to avoid the risk of it being found unsound, acknowledging that the judgment on soundness is in the gift of the Independent Inspector of the Secretary of State.

Regarding the representation to reassess Parcel 2, it should be noted that the Green Belt boundary review landscape character assessment provided a strategic overview of the prevailing character of the parcels and their potential sensitivity to change and potential for accommodating a strategic level of development. This included an examination of the parcels to identify their particular physical characteristics, visual characteristics and obvious perceptual characteristics. The McLaren planning permission therefore did not influence the assessment outcome as the planning permission was not implemented at the time of assessment. No further study as suggested by the representation is therefore necessary.

The Council has carried out a Green Belt boundary review (by Peter Brett Associates) and a landscape assessment and Green Belt review (by Hankinson Duckett) to assess the land east of Martyrs Lane against the purposes of the Green Belt. Based on the outcome of the studies, development of the Martyrs Lane site would lead to urban sprawl and will also have adverse impacts on the landscape character of the area. These are material considerations that the Council will take into account in its decisions about the preferred approach to safeguarding. However, consideration of the landscape character of the site is only one of many factors that will inform the Council's decisions, and the overriding goal is to identify the most sustainable site(s) when compared against other reasonable alternatives. The overall purpose of the planning system is to contribute to the achievement of sustainable development.

The decision to consult on the option of the land east of Martyrs Lane as a reasonable alternative is a legitimate one and there is evidence to justify the decision. Paragraph 182 of the NPPF deals with the examination of Local Plans. It stresses that to be found sound, a Local Plan amongst other things must be justified. The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It would have been irresponsible of the Council if it did not at least consider the land east of Martyrs Lane as a reasonable alternative in the light of the changing circumstances regarding the part of the land in the ownership of McLaren which occurred after the Regulation 18 consultation and when the Green Belt boundary review was carried out. The delivery of the Core Strategy will impact on all aspects of life of people who live and work in the borough. In this regard, Members and Officers of the Council has a duty to familiarise themselves with all the necessary information that might be relevant to inform their decisions about the Site Allocations DPD, which is one of the key means for delivering the Core Strategy.

The Martyrs Lane proposal is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The key requirements that will form part of the allocation of the site if it is safeguarded will ensure that the ecology of the site is fully assessed and measures of mitigation incorporated into the design of any proposal.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Whilst a detailed ecological assessment of the site has not been carried out to date, the appropriate time to undertake such a study would be at the development management stage. The land will only be released for development as part of the review of the Core Strategy and or the Site Allocations DPD, and that will be the most appropriate time to set out the key requirements for any development to be acceptable.

Environmental organisations such as the Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected. It is highlighted that Natural England has not objected in principle to the safeguarding of the Martyrs Lane site.

The Council accepts and has always acknowledged that the SPA should be accorded the uppermost environmental protection under the European Union Directive. The importance of the SPA is within the hierarchy of environmental designations is acknowledged in Policy CS7: Biodiversity and nature conservation of the Core Strategy. Policy CS8: Thames Basin Heaths Special Protection Areas of the Core Strategy is a specifically crafted policy to avoid harm to the SPA as a result of development. The policy mirrors and is in general conformity with the requirements of Policy NRM6 of the South East Plan. The policy takes a precautionary approach to the protection and conservation of the SPA and development will only be permitted where the Council is satisfied that this will not give rise to a significant adverse effects upon the integrity of the SPA.

The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of

Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided adequate contributions are made towards the provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the site. Officers are confident that the above requirements will be met if the Council decides to safeguard the land for future development.

It is acknowledged that the proximity of development to the SPA is an issue that needs to be taken into account in seeking to avoid harm to the SPA. The Council is aware of surveys carried out about the locational relationship between development and the SPA. However, that is not and should not be an absolute constraint to development. In fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will always learn lessons from similar existing sites and work in partnership with Natural England to agree appropriate measures of mitigation for any potential proposal.

Natural England submitted representation in response to the consultation. It does not have any objection in principle to the safeguarding of the site. It notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed.

Officers accept that previous evidence gathered by the Council supported the safeguarding of the original six sites to meet future development needs of the borough. The Council broadly followed the recommendations of its evidence and the draft Site Allocations DPD reflects that. However, it is also a fact that representations received as a result of public consultation is a significant source of relevant evidence, and given that it is legitimate for the Council to carry out the consultation exercise, it is critical that any evidence gathered as a result of that is taken into account before decisions on the preferred approach to safeguarding are taken. The overall goal of the Site Allocations DPD is to identify the most sustainable sites for development when compared against other reasonable alternatives. The Council will have to balance the information it receives from the consultation with its previous evidence to inform its decisions to achieve this goal.

Regarding the representation on paragraph 3.5.22 of the Green Belt boundary review, this should be seen in the context of the change in circumstances that had occurred since the Regulation 18 version of the Site Allocations DPD was published. At the time of the Green Belt

boundary review and the Regulation 18 consultation, the part of the land in the ownership of McLaren had planning approval for 60,000sq.m of applied technology centre (ref. PLAN/2011/0823) and was therefore not assessed on its own or as part of a comprehensive development of the total area. Since then McLaren has got a similar planning approval (albeit c.8,000sq.m less floorspace) to consolidate their operations at their existing site west of the A320 (ref: PLAN/2014/1297). Part of the condition for the new planning permission is that the planning approval on the land east of Martyrs Lane will be revoked when development commenced at the existing site. This is a significant change of circumstances that was not previously considered, which justified the testing of this land in combination with the other adjacent sites as a reasonable alternative. It is stressed that no decision had yet been made to substitute the land east of Martyrs Lane for the previous six safeguarded sites.

Whilst Green Belt land to the south of Woking had been previously considered as a potential direction of growth in the Borough, the Core Strategy does not identify the south of Woking as a broad location for long term residential development. The Core Strategy identifies the whole Green Belt as broad location for future growth and requires a comprehensive review of the entire Green Belt with the view to identifying the most sustainable sites for development. This approach to the Green Belt boundary review was debated at the Core Strategy Examination and supported by the Inspector. Figure 3: Areas identified for growth of the Core Strategy provides a clear illustration of this.

The findings of the Green Belt boundary review, including the assessment regarding Parcel 20, has been carefully considered by the Council. Nevertheless based on the above, it is considered to be reasonable and legitimate for the Council to consult on an alternative safeguarding option. The Local Development Framework Working Group gave clear reasons why the land should be identified for consultation and this is documented and on the Council's website.

The Council has an up to date Core Strategy that has been prepared in general conformity with the NPPF. The Core Strategy makes provision for the delivery of 4,964 net additional dwellings between 2010 and 2027, an annual average of 292 dwellings. Any suggestion that the failure to meet the objectively assessed housing need means that the Core Strategy was not positively prepared or that the Core Strategy Inspector reluctantly found the Core Strategy sound would be an incomplete interpretation of the provisions of the NPPF, in particular, paragraph 47. The Site Allocations DPD seeks to identify specific deliverable sites to enable the comprehensive delivery of the Core strategy housing requirement. The Council acknowledges that its objectively assessed housing need is 517 dwellings per year. The NPPF requires the Council to use its evidence to ensure that the Local Plan meets in full objectively assessed need for market and affordable housing in the housing market area, as far as is consistent with policies set out in the NPPF. The Core Strategy has been examined against the policies of the NPPF taken as a whole and found sound. It would therefore be unreasonable to suggest that the Site Allocations DPD should plan to meet the objectively assessed housing need for the area. In any case, it will not be the role of the Site Allocations DPD to reset the housing requirement without the proper assessment of its impacts on jobs and infrastructure provision. The setting of the housing requirement is the sole role of the Core strategy as set out in the Local Development Scheme. Based on historic housing delivery for the last 10 years and on a number

of assumptions, the Council has projected that it will continue to enable the delivery of 292 dwellings between 2027 and 2040, whilst acknowledging that an exact housing requirement can only be confirmed during the review of the Core Strategy and based on up to date evidence and policy context at the time. The approach to safeguarding should therefore be seen in this context. Against this backdrop, the Core Strategy was positively prepared and provides the necessary and appropriate strategic policy context for the preparation of the Site Allocations DPD.

Overall, the Council believes that the issue raised by the representation regarding housing targets is beyond the scope of the Site Allocations DPD. In addition it is considered that the harm to sustainable development for bringing forward the delivery of the safeguarded sites during the Core Strategy period would far outweigh the benefits for meeting the objectively assessed housing need.

The attempt by the representation to include site GB14 as part of the safeguarded sites proposed to be replaced is misleading. It is clear from the consultation document that GB14 is not a subject of the consultation.

The merits and sustainability assessment of GB14, as set out in the representation, are therefore outside of the scope of this particular consultation. As clearly defined in the Land to the east of Martyrs Lane consultation paper, the Council was consulting on the possibility of substituting the land to the east of Martyrs Lane for the six original safeguarded sites identified in the draft Site Allocations DPD. These six sites are specifically set out in paragraph 1.11 and did not include GB14: Land adjacent to Hook Hill Lane. It should also be noted that a number of these representations were submitted to the Council at the Regulation 18 consultation for which the Council will take into account in its decisions. If the intention is to promote site GB14 as a suitable site, the appropriate stage to do that will be at the Regulation 19 stage and not on the back of the Martyrs Lane consultation. It should be noted that the same Green Belt boundary review used by the representation to justify why Martyrs Lane should not be safeguarded did not recommend that site GB14 should be released to meet future development needs.

**Contributor Reference:** 02373/1/001  
**Customer Name:** Mr Christopher Stableford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00525/2/001  
**Customer Name:** Horsell Common Preservation Society

**Summary of representation:**

The land east of Martyrs Lane makes irreplaceable contribution to the purposes of the Green Belt, to the objectives and opportunities of the Thames Basin Heaths national character area, as functionally linked and supporting the Thames Basin Heaths Special Protection Area (SPA) and as a vital part of a wider ecological and landscape network.

The Site Allocations DPD must demonstrate and make sure that the most sustainable and least environmentally damaging options are being safeguarded for the future. The loss of Green Belt to meet future development needs cannot be considered on the basis of Green Belt purposes alone, albeit a very important aspect of the overall considerations. In order to execute its planning duties fully, it is anticipated that the Council will also give weight to the full range of other factors that influence the most sustainable choice for safeguarding now, to provide future development allocations. To include a site that is less appropriate than those excluded would not pass the tests of soundness. It is anticipated that the Council will consider all relevant factors and provide full justification for their preferred option.

**Officer Response:**

The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

The Council has carried out a Green Belt boundary review (by Peter Brett Associates) and a landscape assessment and Green Belt review (by Hankinson Duckett) to assess the land east of Martyrs Lane against the purposes of the Green Belt. Based on the outcome of the studies, Officers will agree with the representation that the development of the site would lead to urban sprawl and an incursion into the Green Belt. It would also have adverse impacts on the landscape character of the area. This is a material consideration that the Council will take into account in its decisions about the preferred approach to safeguarding. However, as highlighted by the representation itself and emphasised by Officers in other responses, consideration of the contribution of the site to the purposes of the Green Belt is only one of many factors that will inform the Council's decisions, and the overriding goal is to identify the most sustainable site(s) when compared against other reasonable alternatives. The overall purpose of the planning system is to contribute to the achievement of sustainable development.

The Council does not accept that the development of the site would compromise the overall integrity of the nearby Thames Basin Heaths Special Protection Area and its ecological integrity and the ecology of the wider area. The site can be developed to comply with the requirements of Policies NRM6 of the South East Plan and CS8: Thames Basin Heaths Special Protection Areas

of the Core Strategy. Natural England does not have any objection in principle to the proposal, subject to the appropriate measures of mitigation being agreed. This matter has been addressed in detail in the Officer's response to the other representations made by Horsell Common Preservation Society. There is no proven functional linkage between the SPA and the site, which is of such significance to prevent the development of the site.

The Council would agree that the identification of sites to be released from the Green Belt for development should not solely rest on the contribution of the site to the purposes of the Green Belt. It is clear from the draft Site Allocations DPD and the Martyrs Lane consultation document that the Council has relied on a range of studies, evidence and factors to inform the selection of site. This includes sustainability appraisal, transport assessment, landscape assessment, flood risk assessment, viability, availability and sustainability of sites. The list of evidence used to inform the Site Allocations DPD can be found in Appendix 1 of the draft Site Allocations DPD and on the back of the Martyrs Lane consultation document. The attention of the public has been drawn to the evidence to inform their representations.

Paragraph 182 of the NPPF requires the Council to submit a Site Allocations DPD for Examination that it considers is sound. That is exactly what the Council will do and this will minimise any risk of the DPD being found unsound. In particular, the Council would only safeguard land that it considers are the most sustainable based on proportionate evidence when compared against other reasonable alternatives.

**Contributor Reference:** 02453/1/001  
**Customer Name:** Jan Frederiksen

**Summary of representation:**

Strongly supports the proposal for developments on the Martyrs Lane site.

Pyrford Green Belt areas is enjoyed and has public access and Martyrs Lane sites is largely derelict and an eye sore.

The Martyrs Lane sites have the greatest economy of scale, cost effectiveness in terms of all infrastructure needs and being centralised on one area would cause minimum disruption to traffic and the area as a whole.

The NZ Golf Club if not encompassed at this stage is a facility enjoyed by a small minority of members most of whom are not residents in the area and would provide ideal scope ,with minimal disruption, for subsequent development phases.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Whilst local residents do not directly benefit from the New Zealand Golf Club, the course is identified as a sports and recreation facilities in the Borough, and the loss of it would conflict with relevant policies of the Development Plan for the area. As with most of the golf courses within the Borough, the course provides an element of amenity and biodiversity value.

**Contributor Reference:** 02471/1/001

**Customer Name:** Mr Guy Miller

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02973/1/001  
**Customer Name:** Mr David J Askew

**Summary of representation:**

Martyrs Lane is the best option for the proposed housing plan as it will be less detrimental for the West Byfleet Pyrford Byfleet Wards.

**Officer Response:**

Support is noted.

If the representation is referring to disruption to existing communities, this is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02478/1/001  
**Customer Name:** Mrs Susan Carolin

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02495/1/001  
**Customer Name:** Mr Alan Krikorian

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

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Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

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The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02498/1/001

**Customer Name:** Mr Roy Gigg

**Summary of representation:**

Support the Martyrs Lane proposal as it would produce economies of scale to enhance local infrastructure with new facilities. Developing small sites will overload the existing over capacity local infrastructure.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02488/1/001  
**Customer Name:** Ms Tina Williams

**Summary of representation:**

Supports development in the area east of martyrs lane

**Officer Response:**

Support noted

**Contributor Reference:** 02474/1/001  
**Customer Name:** Mrs Maria Rosie Tuckwell

**Summary of representation:**

The safeguarded sites in the draft site allocation DPD, specifically in Pyrford, Byfleet, and Mayford, should remain safeguarded, and therefore I am in favour of substituting the six sites, totalling 1024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Gold Course.

The Pyrford fields on Upshot Lane remain in virgin Green Belt and have been farmed continuously over the centuries and thus are essential to retaining the character of the Pyrford area.

Difficult consultation as all sites are within the Green Belt but on balance, support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made

representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02521/1/001  
**Customer Name:** Mrs Elaine Tilley

**Summary of representation:**

Strongly support substituting the land to the east of Martyrs Lane for safeguarding sites identified in the draft Site Allocations DPD to meet the long term future development needs of Woking Borough between 2027 and 2040.

This is a much better site than those identified to date in Byfleet, Mayford and Pyrford.

The northern section of the site has previously been granted planning permission.

Most of this northern section is poor quality environmentally, may be contaminated with previous military and commercial use.

It is adjacent to the A320 with direct access to Woking to the south and the M25 to the north.

There are employment opportunities at McLaren nearby.

The southern section of the site is a private golf course, it is not a local resource and there is an excess of golf courses locally.

The Martyrs Lane site is too large for the number of house needed in the 2027 – 40 and it can therefore provide land for other needs i.e, employment, schools, health and community facilities or held over for future housing needs.

The site is not as isolated as can access West Byfleet railway station and shopping facilities.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to

enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

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The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council has robust policies in place to ensure that any land contamination is fully assessed and remediation measures are undertaken prior to development taking place. The planning

process and development management process in this regard would be similar for development at any of the proposed sites.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

**Contributor Reference:** 00033/3/001  
**Customer Name:** Ms Kate Gulliver

### **Summary of representation:**

Support for the Martyrs Lane site to be developed over the 6 considered site allocations for the following reasons

The Martyrs Lane site is a previously developed site. Pyrford's fields form a key part of the escarpment and setting, have been farmed and highlighted in the Pyrford Neighbourhood Plan.

Martyrs Lane's 3 sites to the north of the golf course are almost unused, partly pre-developed and derelict. There is no landscape element, no known footpaths and the public seem not to use it.

In 2012 planning permission was granted to McLaren for a 60,000 sq. ft factory facility. Mr Freeland, a senior WBC planner, recommended that planning permission be granted as there was no concern about the development being a risk of unsightly buildings or urban sprawl which would harm the Green Belt. The application was approved by the Secretary of State. The building of houses is a viable alternative based upon many of the reasons given for approving the McLaren planning permission.

The land retains several former Army buildings, disused sports fields and general debris, including scrap cars. The SCC waste site ( to be retained ) has a derelict 7 hectares at the rear. Both of the sites have been offered up to WBC for sale and green belt release for several years now.

The 3 sites to the north of the New Zealand Golf Course should have been prioritised by WBC in its initial Regulation 18 Consultation but seem to have been overlooked. Instead the two fields in Pyrford, land in Mayford/Hook Heath and Byfleet were advanced as the recommended sites for release from Green Belt. This is unacceptable when the previous use and availability of the Martyrs Lane site is considered.

Site Capacity – 1024 Dwellings – There is confusion about how many new dwellings are required on safeguarded land in the period 2027–2040 with figures ranging from 900 to 3500. There is in fact only one figure required and that is 1024 as stated in the consultation documents.

Building on New Zealand Golf Course is not necessary to satisfy the requirement for 1024 dwellings on land safeguarded for development in the period 2027–2040.

Green Belt Constraint – The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford on this criteria.

The Brett report considered the Pyrford land to be in category Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The parcel is identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24.

Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford fields.

Landscape character and sensitivity to change – The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character. The Surrey Landscape Character Assessment says of the land encompassed by parcel 9 'the enclosed farmland, experienced from the public rights of way network, give the area a rural feel.'

Ancient tract – Pyrford Neighbourhood Plan states of this area that 'The area has one particularly ancient tract around the medieval St Nicholas' Church and the escarpment along Warren Lane and Church Hill. It is believed the area represents one of Surrey's last remaining examples of natural beauty, in a farming setting.'

Martyrs Lane no local or national land designations and has been previously developed.

#### Economic and Social Benefit

1. Economies of Scale – One larger site of 1024 properties would provide economies of scale, making it easier to resolve infrastructure issues like water, waste, and electricity when compared with the provision of equal services on 6 separate sites spread across the whole borough.

Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by 6 separate sites.

Affordable homes – land values of northern sites are much less than the 6 original sites suggested and this would facilitate the provision of affordable housing.

Employment – There are three large employers close by the Martyrs Lane site – McLaren, Animal & Plant Health Agency and St Peter's Hospital. The latter needs affordable housing for its employees who work shifts and bus 446 passes Martyrs Lane to the hospital.

#### Infrastructure

The selection of Martyrs Lane would allow new and efficient infrastructure providing much needed new facilities.

Also there would be less disruption to existing communities than with the original 6 sites.

Proposed developments Current intentions from Sheer House, Broadoaks and West Hall which will result in approximately 950 new homes will impact the local area and congestion.

Road Congestion – Summary information compiled from the Surrey County Council (SCC) traffic reports suggest that the average impact of 900 dwellings at Martyr's Lane based on the 10 "worst" roads or junctions will have less impact on traffic conditions than the development proposed for Mayford, or the combination of developments proposed for Byfleet and Pyrford. These traffic studies suggest Martyrs Lane would alleviate the congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking.

Road Links – The Martyrs Lane site has the benefit of main road links – Chertsey Road to Woking and in the other direction Chertsey and the M25, also from Woodham Lane there is access to Sheerwater and West Byfleet. These are all A roads.

Currently, safeguarded sites in Pyrford & Byfleet are accessed by B or C roads. Traffic flow along the A245 through West Byfleet & over M25 bridge is at capacity.

Traffic Access – The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to the A320.

Healthcare – The West Byfleet Health Centre is fully subscribed. With the potential number of new dwellings and space at Martyrs Lane, there would be an opportunity to build a new health centre and relieve current healthcare resources at West Byfleet facility.

Schooling – Pyrford C of E Primary School is already full and has taken many pupils from the Maybury area. The Martyrs Lane site would be an ideal opportunity to build a new school as part of the development plan.

Public transport – Martyr's lane already has better bus services than other sites. Currently the 446 bus runs on the Chertsey Road until 22:00 in the evening and has a Sunday Service. Buses in Pyrford stop at c18:00, Byfleet at 19:00 and Mayford at 20:00 and there are no Sunday Services. McLaren also operate an employee bus service that could contribute to Martyrs Lane connectivity services. Arranging adequate services at one site will be easier than to several dispersed sites.

#### Amenity and Heritage

Amenity value – Green Belt land in Pyrford is very accessible and actively used by walkers, runners, cyclists and others from all across the borough. By contrast Martyrs Lane is not easily accessible and in comparison rarely used by the public despite its green belt status.

Heritage – The Surrey Landscape Character Assessment describes some of the heritage features of the western section of character area SS10, which includes parcel 9, 'the historic wooded grounds of Pyrford Court are grade II listed, and a Conservation Area covers Pyrford Village. Pyrford Common is designated as a Site of Nature Conservation Interest'. To these features can be added the Aviary Road Conservation Area and the network of ancient footpaths. The two fields are integral to the heritage setting of the area.

Martyrs Lane has limited public footpaths through the area and has no known heritage value.

The entire 112 hectares provides a viable new Green Belt Boundary but there is no requirement to allocate all the land for housing and the golf course provides green space.

There is no local or national landscape designation on the Martyrs Lane site. There are no listed buildings on the 3 northern sites and there is no known heritage value to the land on Martyrs Lane to the north of the golf club.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the 6 original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

#### **Officer Response:**

Support for Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This site in Pyrford is not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that this particular site is of low soil quality.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable

Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By

this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

If the Council were to decide to safeguard this site or the other six sites, its development will take into account any development proposals in the vicinity of the site.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02373/2/001  
**Customer Name:** Mr Christopher Stableford

**Summary of representation:**

The land to the East of Martyrs Lane is unsuitable for future development, due to the lack of road infrastructure in the area and the traffic levels are already excessively high, and the development at Fair Oaks Airport will place additional strain on these roads. The concentration of expansion in one area is too great, and therefore the existing reserved sites represent better choices.

**Officer Response:**

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a

single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

**Contributor Reference:** 02406/1/001  
**Customer Name:** Mr Trevor Cullum

**Summary of representation:**

Objects to developing on the Martyrs Lane site as it will have an adverse impact on local infrastructure, such as roads and traffic, the local environment and general quality of life in the area.

**Officer Response:**

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures. This will be the case irrespective of whether it is a single site or multiple sites.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt

boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the

Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

**Contributor Reference:** 02395/1/001  
**Customer Name:** Mrs Jennifer Warren

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

The top part of the site was recently granted planning permission for a technology centre.

The top part of the site also includes pre-developed land used as a wartime army camp, and now semi-derelict

Much of the northern side is publicly owned land, so the sale would help council tax payers.

Much of the northern site has already been used for non-agricultural purposes.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools, possibly social housing, doctor surgeries, traffic volumes, waste water, etc.

The northern part of the site is well served with public transport, unlike the other six sites.

The northern part of the site has access on to the A320 via a roundabout, with its direct links to the M25 and to Woking town centre.

The northern part of the site is close to major local employers like St Peter's Hospital, the Animal & Plant Health Agency, and McLaren's.

Fewer Woking residents would be impacted with one site on the northern part than by six individual sites.

Concerned at the Pyrford fields being developed as traffic is congested in the area. Apart from the impact on the roads, the local schools, health centre, etc. are struggling with existing numbers. That area of Pyrford is on an escarpment and is also part of a designated special conservation area.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst

this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

**Contributor Reference:** 02402/1/001

**Customer Name:** Mr Rick Wills

**Summary of representation:**

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

This would provide many clear economic and social benefits and economies of scale, as well as social benefits from including a suitable school, community and health services and social housing at Martyrs Lane, all of which would not be logistically suitable or would be economically comparable in Pyrford.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02407/1/001

**Customer Name:** Dr And Mrs Christopher And Claire Smith

**Summary of representation:**

Support for Martyrs Lane and opposition to development on Pyrford fields. The roads in Pyrford do not have the capacity to cope with the additional demands that such a proposed development of housing would create

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

A Martyrs Lane development would have immediate access to the A320 which appears to have capacity to handle additional traffic and gives much easier access to the M25 as well as to central Woking.

**Officer Response:**

Support for the land to the east of Martyrs Lane and opposition to development on Pyrford fields is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding

policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02408/1/001  
**Customer Name:** Mr Mike Osborne

**Summary of representation:**

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other

constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations

DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02409/1/001  
**Customer Name:** Mr Nicholas Eliot

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey

County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02410/1/001  
**Customer Name:** Ms Hanna Wilkin

**Summary of representation:**

Objects to any development of the Pyrford fields as Pyrford fields have been farmed, contribute to the character of the area. This area also has setting around the medieval St Nicholas' Church and the grassy slopes along Warren Lane and Church Hill.

The Pyrford Green belt has several conservation areas which together with other projects such as historic house restoration.

Green Belt land in Pyrford is very accessible and actively used by walkers, runners, cyclists and others from all across the Borough.

Proposed development from Sheer House, Broadoaks and West Hall will result in approximately 950 new homes. This is more than the infrastructure for the Pyrford/ West Byfleet area can cope with.

Martyrs Lane will have the least impact on Woking overall as a single site, sites to the north of the golf course are almost unused. There is no landscape element, no known footpaths and not utilised by the public.

As there was planning permission granted to McLarens in 2012 and therefore suitable for development

**Officer Response:**

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

If the Council were to decide to safeguard this site or any of the other sites, its development will take into account any development proposals in the vicinity of the site.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

**Contributor Reference:** 02411/1/001  
**Customer Name:** Mr Robert Manning

**Summary of representation:**

Supports Martyrs lane site to substitute several smaller sites with a single development that can support the necessary ancillary infrastructure.

The Martyr's Lane site appears to be well sited for access to Woking and arterial roads, including the M25.

Investment in quality park spaces for children, additional investment in the nearest school/healthcare, additional bus/cycling access.

The other six sites cannot deal with the road congestion.

Economies of scale to concentrate the development in one place and gain the best return.

The site appears larger and have new community amenities.

Most of the land at Martyr's Lane appears to include more derelict 'green belt' land than several of the alternatives that have amenity value to the local population.

Some land in the multiple parcels are agricultural, which should be protected.

In summary, support the use of the land east of Martyr's Lane due primarily to the economies of scale that should maximise the new infrastructure to support the enlarged local community and to integrate with the transport network.

If the Golf Course land is used to provide enhanced public amenities and green space then that is desirable and supportable.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration.

The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

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The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Whilst it is correct that the Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed

safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

**Contributor Reference:** 02414/1/001  
**Customer Name:** Mr Graham Pereira

**Summary of representation:**

Opposed to building on Pyrford's Green Belt. Increase in traffic and the number of vehicles going through Bolton's Lane as a short cut to West Byfleet, A3 and Old Woking Area.

The Green Belt at the top of Upshot Lane has been farm land and used for walking.

Stop building offices on our green belt in Old Woking.

Building on Pyrford's village will reduce property prices.

Woking and Surrey Council need to ensure what they promise is delivered.

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council is not aware of any proposed office developments within the Green Belt within Old Woking. As set out in the Core Strategy and Development Management Policies DPD, the Council will protect Green Belt from harmful development and strict control will be applied over in appropriate development.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

A reduction in property value is not a material planning consideration, however, the Council is satisfied that robust policies are in place in the Development Plan for Woking to prevent adverse impacts on the social, environmental and economic character of any area in which development takes place.

**Contributor Reference:** 02416/1/001  
**Customer Name:** Ms Barbara Boyse

**Summary of representation:**

Support the Martyrs Lane proposal

The Martyrs Lane site is certainly big enough to accommodate any future housing needs and any necessary infrastructure such as shops, health centre etc. There would also be land available as open green space for residences recreation and wildlife.

The A320 to the north of Woking has easy access to the M25 and Woking Town Centre with its main railway station. South of Woking the A320 is already heavily congested and will only get worse once the hoe Valley School on Egley Road opens.

Provision for a 24 pitch Gypsy/Travellers site

The site also has no National or local landscape designation unlike those here at Mayford i.e, escarpment and rising ground landscape importance issues.

McLaren had previously been given Planning Permission on the proposed site so assume that this land is certainly suitable for development.

Major employers are (St Peter's Hospital, the Animal and Plant Health Agency, McLaren and also the nearby Brooklands Retail Park. )

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using

its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through

careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02417/1/001  
**Customer Name:** Mr Harry Stollard

**Summary of representation:**

Martyrs Lane will have the least impact on Woking overall because the land is a single site, has been previously developed, is partially derelict and less than half is necessary to meet Borough requirements.

In contrast the fields on Upshot Lane are in virgin Green Belt, have been productively farmed, are used for amenity and are fundamental to the semi-rural character of both the local Pyrford Escarpment and the Village of Pyrford.

Any building of homes on the proposed scale will impact on all local communities quality of life because of the increased pressure on the infrastructure. Our roads and schools are already overcrowded and inadequate. However, Martyrs lane would be less damaging.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that less than half is needed, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all

other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02460/1/001  
**Customer Name:** Mr Roger Allen

**Summary of representation:**

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

The Martyr's Lane site, excluding the new Zealand Golf Course, can accommodate at least as many dwellings as the six alternative sites, and would offer advantages in terms of economies of scale for infrastructure services, proximity to major employers such as McLaren and St Peter's Hospital, and better access to public transport and main road links.

A single site also offers the best prospect for including much needed services such as a school and a medical centre, which will be needed to accommodate the extra population, wherever the new homes are situated.

The Martyr's Lane site includes land which was recently given planning permission for building, some pre-developed land used as a wartime army camp and now semi-derelict; and some which has already been used for non-agricultural purposes.

In the case of the two Pyrford sites, there are strong arguments based on the unique rural environment of those sites, which the Brett Report on Woking Green Belt described as fundamental to the green belt.

This site will minimise disruption to both the environment and the local community.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information,

the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the

Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02455/1/001  
**Customer Name:** Mr John Carolin

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

This consultation process is misleading as it gives the impression that the two options are mutually exclusive and that at least one of them is a valid proposal, all the options are possible.

The Pyrford fields (GB12 and GB13) should not be taken out of Green Belt. WBC's evidence base shows that they should not be removed.

The Pyrford fields have a critical and continuing role in fulfilling important purposes of the Green Belt, namely restricting sprawl and safeguarding the countryside from encroachment.

Any development of the Pyrford fields is negative in terms of sustainability versus other available options. The fields are distant from any town centre, secondary school, and GP facilities.

Public transport is very limited and they are distant from any railway station.

Local roads could not support such development alongside other proposed developments in the vicinity.

Development of the Pyrford fields would have a negative impact on important natural, historic and cultural assets and on landscape.

The Pyrford fields are agricultural land.

The reason for selecting the Pyrford field GB13 parcel was entirely without transparency or any rationale.

Runneymede Borough Council commented on GB12 and GB13 "It is unclear from the published material why these parcels were considered to be appropriate for future development."

There are large areas of land in Woking not in the Green Belt that are yet to be properly considered for housing development.

Some areas of land in Woking's Green Belt were not properly considered in the PBA report

Reasons why neither option is valid

The Green Belt boundary around Woking should not be changed in order to release land to developers for new housing because the fundamental purposes of Green Belt remain sound and wholly applicable

The demographic assumptions underlying WBC's proposals to change the Green Belt are deeply flawed and should be deferred

There is no overall shortage of housing in Woking that cannot be addressed without changing the Green Belt.

WBC should increase its intervention in the social rental market and support other national and local fiscal actions that help people afford a home. Building new dwellings the Green Belt is not a practical solution to this particular problem.

Central government is not instructing local authorities to build new housing in areas of the Green Belt that have not been previously developed, as reiterated in the recent housing white paper. Pyrford's fields are indeed those 'green fields' that need to be kept permanently open.

The decline in participation in golf in the UK and over-supply of golf courses. Both land within the Green Belt and not in the Green Belt are devoted to golf. Rationalisation of this major land-use is required.

#### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper. The representation regarding infrastructure, the evidence used to inform the Site Allocations DPD, site assessments and alternative sites, have also been addressed in the Regulation 18 consultations Issues and Matters Topic Paper.

The representation is correct that the options are not mutually exclusive. The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed. The conditions attached to the latest planning approval at the McLaren site west of the A320 (PLAN/2014/1297) presented a change in circumstance to justify the Martyrs Lane consultation. Representations received during the consultation will provide useful information to inform Members on their preferred approach to safeguarding. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives. The merits of the original six sites have already been given in the Officer's

response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593

operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to

protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 02484/1/001  
**Customer Name:** Ms Catherine Reeve

**Summary of representation:**

It will impact heavily on the local infrastructure and facilities. Any development in excess of 1200 homes in this area would create further stress on the local provision of medical and social services, schools, rail stations, car-parking and shopping areas. All such facilities are already extremely crowded. It would be better, to spread future developments into smaller parcels across several areas of the borough.

As part of the Green Belt the site is critical in checking urban sprawl and in providing a refuge for wildlife, some of which could be protected species or of international conservation importance.

The Sheerwater development, West Byfleet development and Fair Oaks Garden Village development will create additional stresses on the area

Exacerbation of traffic congestion. The proposed development would add additional pressure on the road network initially from construction traffic, from the addition of new junctions to existing roads, and subsequently from the traffic generated by the new residents of the area and the services they require.

Poor public transport provision in the area.

Ecological impacts on the proposed site. The diversity of habitats on a site of this size, and its proximity to at least three sites of nature conservation importance means that it is very likely to be a significant site for biodiversity. Impact on wildlife from development and residents with pets. The proposal to consider this Green Belt area for future development seems to have been made without any detailed ecological evaluation of the site.

At least three ecologically important sites are adjacent or very close to the proposed development area on the land east of Martyrs Lane: the New Zealand Golf Course Site of Nature Conservation Importance (SNCI), the Birch Wood and Hoyt Wood SNCI and Horsell Common Site of Special Scientific Interest (SSSI) which is part of the Thames Basin Heaths Special Protection Area (TBH SPA).

The creation of a SANG as part of a development of the size proposed will be an inadequate response to these problems as it is most unlikely to meet demand, especially with the combined impact of nearby developments will be detrimental to biodiversity and the integrity of the TBH SPA. Woking Borough Council should prioritise the protection of the SPA.

**Officer Response:**

Opposition to the Martyrs Lane site noted.

The matters of urban sprawl, wildlife, traffic congestion and public transport are already addressed the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater and West Byfleet.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

It is acknowledged that the Martyrs Lane site is in close proximity to ecological sites such as Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse

impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

Policy CS8: Thames Basin Heaths Special Protection Areas (SPA) of the Core Strategy accords priority to the protection of the Thames Basin Heaths SPA. The Council has identified sufficient SANG capacity through existing SANG sites and proposed allocations in the Draft Site Allocations DPD to enable the delivery of the Core Strategy and beyond. The Council will engage with Natural England to agree the nature and size of the SANG that will be needed to serve this development if it is allocated. The Council will initiate the discussion at the appropriate time.

**Contributor Reference:** 02422/1/001  
**Customer Name:** Mr and Mrs G and P Ankers

**Summary of representation:**

Supports for the Martyrs Lane site to be substituted for the other sites.

Not all Green Belt land is equally worthy of preservation and, accepting that some must be released for house building, it makes sense to retain the more useful and attractive pieces of land. The fields in Pyrford are productive agricultural land and provide picturesque views across the escarpment to the hills beyond.

By contrast, the Martyrs Lane site has little visual appeal and, apparently, no agricultural value. Furthermore, part of it has already been built on and is derelict and unsightly.

It has planning permission for a factory on part of the land.

However, as this piece of land, excluding the New Zealand Golf Club, would seem large enough to build the 1024 dwellings planned for the original 6 sites, there is no need to build on the Golf Club land or to remove it from Green Belt at all.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02423/1/001

**Customer Name:** Mr Ian Mills

**Summary of representation:**

Strongly support the substitution of land to the east of Martyrs Lane for the 6 sites allocated for safeguarding for development post 2027 in the Regulation 18 Consultation of June 2015 for the following reasons:

There are major concerns in Pyrford regarding infrastructure and services for example, the local primary school is at capacity, the West Byfleet health centre is fully subscribed and Water supply and sewage disposal.

There are also major concerns relating to traffic congestion in Pyrford and West Byfleet.

Officer responses to regulation 18 submissions have made reference to the Surrey County Council transport studies. No study appears to have been done that includes the proposed development in West Byfleet (West Hall), the Pyrford fields, Sheer House, Broadoaks, the expansion of the International School on Old Woking Road, and the developments on the A3 near Ripley including Wisley airfield.

As far as the Surrey County Council studies themselves are concerned the January 2015 study shows, for the 10 roads with the highest increase in traffic flow, increased flows for the Mayford, Byfleet + Pyrford, and West Byfleet developments.

The comparable figures from the September 2016 study for 900 dwellings East of Martyrs Lane are lower than the above sites (individually not collectively). This is a clear indication that the 900 dwellings development at Martyrs Lane has a lower impact across the Borough than the sites it is replacing.

It should be noted that the 2016 study for Martyrs Lane includes an extra 500 dwellings at Mayford and 592 at West Byfleet.

In addition Martyrs Lane seems to offer easier mitigation of any traffic problems than is the case for West Byfleet/Pyrford area of concern.

It should be recognised that the Martyrs Lane site has previously been built on, still retains some old army buildings, and had planning permission granted for a McLaren factory on the site. By comparison the Pyrford fields have been in agricultural use for centuries and contribute to the urban landscape.

The Brett report commissioned by the Council shows the Pyrford fields as having very low suitability for removal from the green belt whereas the portion of the Martyrs Lane site, excluding the golf course, has only low suitability for removal from the green belt. The Brett report did not even recommend that parcel GB13 of the Pyrford fields should be considered for

removal, and suggests that only part of GB12 could be suitable. It is difficult to understand why these sites remained under consideration.

It appears that the value of land to the east of Martyrs Lane is likely to be significantly lower than in the 6 sites originally designated. This would provide more opportunity to provide affordable housing and meet the Borough's objectives in this regard.

A single site also offers more opportunity to improve provision of services than 6 widespread smaller developments. It also will minimise the disruption in the already heavily developed localities of the original 6 sites.

The possibility of a major development of around 3,000 dwellings east of Martyrs Lane including the golf course. However the consultation asks about an alternative site to replace the 6 originally designated sites with a combined allotment of 1024 dwellings. This should be achievable on the Martyrs Lane site excluding the golf course.

It should not be overlooked that West Byfleet + Pyrford in a very tight area are already earmarked for over 1,000 dwellings between Sheer House, Broadoaks, and West Hall pre 2027.

#### **Officer Response:**

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The proposed allocated sites of West Hall, Pyrford Fields, Sheer House and Broadoaks were taken into account in the above Green Belt Boundary review assessment. The expansion of the international school on Old Woking would have been assessed at the Development management stage. In terms of the development at Wisley airfield, under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Martyrs Lane is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the

Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

If the Council were to decide to safeguard this site or any of the other 6 sites, its development will take into account any development proposals in the vicinity of the site.

**Contributor Reference:** 02429/1/001  
**Customer Name:** Mr Gavin Smith

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but on balance support the Martyrs Lane proposal.

Planning permission was recently granted for the top part of the site.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst

this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02436/1/001  
**Customer Name:** Mr Peter Anthony Bellion

**Summary of representation:**

Does not agree to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD. The land to the east of Martyrs Lane, the recycle waste centre and New Zealand GC are both in the Greenbelt and very close to protected heathland in relation to the protected ground nesting Dartford Warbler.

The Woodham Lane provides a natural and effective boundary between the Green Belt and the Urban boundary of Woking BC. This is acknowledged in the council's SHLLAA and the employment Land Review that confirm that Woking BC are ahead of its target to provide a 5 year supply of housing as required by the NPPF.

In fact the current statistics, provided by WBC, confirm that in the identification of other sites within the urban boundary there are sufficient sites to enable future Housing supply to be satisfied in the period of the new local plan to 2040 without development in the Green Belt.

The traffic chaos that a new village would create has not been properly considered by Woking councillors. Without proper coordination with Surrey Heath and Runnymede the adjoining boroughs the A320 to the M25 will be horrendous. The proposed development at Fair Oaks will further intensify the roads let alone the infrastructure requirements. As a simple example closure of one side of the A320 recently for mains drainage repair/renewal created traffic jams all around Woking, Chertsey, Knaphill, Addlestone and beyond for months. The councillors cannot possibly ignore all the professional advice on traffic generation.

Allowing new housing sites to be created within Byfleet, Pyrford as infill developments is far more productive without upsetting the existing local infrastructure network. Further identified sites to the south of Woking, Maybury etc where a new school is being built are more productive and causes less disruption.

Objects to the proposed consultation, not only for the reasons above and by other local residents but also because the proposed single site strategy would clearly not meet the legal tests of soundness. As such it would be a pointless and wasteful approach by the Council to push on with this proposal.

**Officer Response:**

Opposition for safeguarding the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs and the numbers required has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The site would have been designated as SPA by Natural England if any presence of Dartford Warbler and Nightjar were significant enough to justify designation.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It was appropriate and proper for the Council to carry out the consultation exercise. National planning policy requires an assessment of all reasonable alternatives before preferred options are identified. The changing circumstances regarding the planning status of the McLaren site post dates the Regulation 18 consultation of the draft Site Allocations DPD and justifies the consultation to enable that option to be tested. The overriding consideration in this regard is to identify the most sustainable land when compared against all other reasonable alternatives. The information that is gathered from the representations is useful evidence to inform the Council's decision on the matter. The consultation exercise is therefore not a waste of time, effort or public money.

Paragraph 182 of the NPPF deals with examination of local plans. It requires the Council to only submit a plan for examination which it considers sound. Amongst other things, to be sound, the plan:

- Should be deliverable over its period;

- Should be the most appropriate strategy when compared against the reasonable alternatives, based on proportionate evidence.

Footnote 11 of the NPPF provides clarity on what a deliverable site is. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Whilst five years is emphasised in the footnote, its relevance should be seen in the context of the details of the representations received from the owners of the land.

The New Zealand Golf Course has written to the Council and has made formal representation as part of the consultation to confirm that the part of the land that is in its ownership will not be made available now, in the future and never to meet future development needs. In this regard, there is no expectation for a change in their position within and beyond five years. The representations from the New Zealand Golf Course are addressed in full separately.

McLaren Technologies Group Limited has also made representations. Whilst it would generally support in principle the release of the land from the Green Belt, it would only allow its land holding to be used as a strategic employment site to support its own future expansion programme. McLaren will not allow its land to be used as envisaged in the consultation. If the Council were to decide not to release the land east of Martyrs Lane from the Green Belt, McLaren have provided reasons why its land should be designated as a Major Developed Site in the Green Belt. The representations from McLaren has been addressed in full separately.

The lack of availability of the above sites could cast doubt on the deliverability of the land if it is safeguarded. To put it into context, assuming the two sites will not be available to meet future development needs and the Surrey County Council's Waste Safeguarded Site is also not available, the residual land will only deliver about 300 dwellings (at 30 dph) as against the 1,200 dwellings that the Council wish to safeguard land. If the Waste Safeguarded Site is made available, there will be sufficient land to enable the delivery of about 600 dwellings at the same density. This is still significantly short of what is needed. Importantly, the Council has to make sure that any land that it safeguards would not lead to an isolated development within the Green Belt.

It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the land is the most sustainable when compared with the original six safeguarded sites.

Regarding the 5 year housing land supply, the Council is currently able to demonstrate it has 5 year of deliverable housing sites to meet its housing needs. Nevertheless, the Site Allocations DPD identifies sites that will facilitate the comprehensive delivery of the Core Strategy as well as safeguard land for future development needs post 2027. The Council considers this to be in line with National Planning Policy.

As set out within the Regulation 18 Consultation Issues and Matters Topic Paper, the Council was able to demonstrate at the examination of the Core Strategy that the Green Belt would be a future direction of growth from 2022. This is based on a comprehensive assessment of brownfield sites in the urban area, in particular the SHLAA. Further information can be found in the topic paper.

**Contributor Reference:** 02446/2/001  
**Customer Name:** Mr Philip Tudhope

**Summary of representation:**

Does not agree with using the land to the East of Martyrs Lane for development. Particularly for residential housing or business development.

The lack of capacity in the roads around this area to take additional traffic and the use of green belt land for urban development.

The road network in this local area is already over-congested and would become overwhelmed if the proposed huge housing development goes ahead.

Protect woodland and green belt areas

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02450/1/001  
**Customer Name:** Mr Lionel Barnes

**Summary of representation:**

Supports the proposed substitution.

Unlike Pyrford, it is an area of no landscape or amenity value and has had developments on it previously.

Would avoid an increase of traffic on the already very busy roads between Pyrford and Woking and between Pyrford and St Peters and the M25. objections to the Martyrs Lane site on the grounds of increased traffic on the A320 northbound are not valid since traffic from any new developments in Pyrford and Mayford would also be using it. Furthermore, having the thousand or so houses on the one site would no doubt justify the road improvements to the A320 which are in fact needed now.

Having all the new build in one place would perhaps justify the inclusion of new facilities, such as a new health centre, to relieve pressure.

Finally, there will be no need to use the golf course for the number of houses that are needed.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02382/1/001  
**Customer Name:** Mr Stewart Hodges

**Summary of representation:**

Sensitive and difficult decision, however when reviewing the evidence and facts, Martyrs lane development would have the least impact on the area as a whole. Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

The required infrastructure to support this course of action would be far less.

The top part of the site has already been granted planning permission

This land has no current use and there is no public access to the land

A single site would provide some economies of scale to sort out the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc.

The northern part of the site is already well served with public transport unlike any of the other six sites

The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without

the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing

structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02426/1/001  
**Customer Name:** Mr Steve Thwaites

**Summary of representation:**

Supports the proposal.

Provides the background to the consultation exercise, noting that parts of the site had previously been discounted on highway, landscape and Green Belt grounds. Sets out the reasons given by the LDF Working Group for assessing the Martyrs Lane site.

Sets out the tests of soundness in the NPPF against which the Local Plan is assessed (paragraph 182), i.e. whether it has been positively prepared, it is justified, it is effective and is consistent with national policy. Uses this framework, with Planning Advisory Service guidance, to assess whether using a single allocation strategy at Martyrs Lane would meet national policy tests.

Positively prepared:

Questionable and the Council has to demonstrate Duty to Cooperate – not clear that Runnymede Council was approached previously regarding impacts on neighbouring borough. It is understood that Runnymede Council will object to the proposal.

Justified:

Questionable whether the reasons given by the LDF Working Group provide anything more than matters of opinion, rather than credible evidence justifying the choice of a single site strategy.

- acceptability for housing development given planning history: proposal was for a different use, which would have different requirements and impacts. There were special circumstances why this was considered acceptable by the Council. Different context to a housing allocation, with different impacts e.g. easier to mitigate and manage traffic impacts for this commercial scheme than a large housing scheme, and would not require same infrastructure (schools, health facilities etc);
- the area has defensible boundaries: fact;
- no local or national landscape designations on the site: true in one respect, but proximity to Horsell Common SPA is significant consideration. It is impractical to provide sufficient SANG, leading to demonstrable harm to SPA.
- transport impacts would not be as severe as forecast, and can be mitigated with cycle and bus routes: the LDF Working Group has misinterpreted the highway authority evidence. Should also be considered with cumulative impacts of other nearby proposals.
- proximity to major employers to reduce commuting: this statement has no credibility as there is no evidence that employees at these organisations will be given priority housing in the new development; or that future residents will be prioritised for employment.
- greater certainty for future urban growth: as much of the land is unavailable the Council can't be confident of implementation or delivery, thus providing lower certainty for urban growth.

Based on robust and credible evidence?

The evidence collected by Officers argues against allocation of this site.

Most appropriate strategy?

Audit train of Council documents indicates that this strategy is not the most appropriate. It goes against professional and technical opinion.

Effectiveness:

The Martyrs Lane strategy does not meet the requirements as it is not based on evidence of sound infrastructure delivery planning, does not have delivery partners who have signed up to it, and is not coherent with strategies of neighbouring boroughs. Existing infrastructure is too distant. Pressures on expenditure and budgets make it unlikely the scheme can be supported self-supporting with its own schools, shops and services. Any new site allocation will need to rely to a large extent on existing infrastructure, which are too far away to serve the development properly.

It is not deliverable.

The dispersed strategy is also more flexible: unexpected obstacles to delivery could stop the single site strategy in its tracks, leading to no delivery of development. A dispersed strategy is more flexible to deliver some development.

Both options are capable of being monitored.

The single site strategy therefore fails on many of the tests of soundness. If pursued, the Council would render itself susceptible to legal challenge. Additionally, objects to the proposal based on all of the practical reasons set out by the Woodham and Horsell Neighbourhood Forum and local residents.

Comments on the Sustainability Appraisal assessment:

SA Objective 1: provision of housing unlikely given the hostility to the allocation by landowners. A more accurate score would therefore be negative in medium term and neutral in longer term.

SA Objective 2: agrees with short-term assessment but score should be negative in both medium and long term as mitigating/optimising measures are impractical and unlikely to be delivered.

SA Objective 4: negative score is more appropriate as the optimising/mitigating measures are over-optimistic.

SA Objective 5: should be a double negative score. Sceptical that on-site infrastructure will be provided, an accessibility to services and facilities will remain limited.

SA Objective 6: should be a negative score. The assessment overestimates the amount of PDL on the site.

SA Objective 7: should be a negative score into longer term as car journeys will dominate.

SA Objective 9: underestimates impact on SPA and inability to provide SANG between the housing allocation and the SPA. Scoring should be double-negative.

SA Objective 11: substantial off-site movement would undermine the positive impact of the new energy efficiency of buildings.

SA Objective 15: the need to travel to services and facilities should lead to a double negative score.

SA Objective 16: should be neutral at best – no evidence to justify a positive score in the longer term.

SA Objective 17: should be negative unless the Council will positively promote economic development on the site.

### **Officer Response:**

Objections to the proposal are noted.

Officers are aware of the tests of soundness and criteria for Plan-making as set out in the NPPF. It is important to note that criteria in paragraph 182 of the NPPF apply to the plan as a whole, rather than to individual site allocation options within it. The draft Site Allocations DPD specifies that the safeguarded sites will be allocated or released for development through a review of the Site Allocations DPD and/or the Core Strategy. The Council appreciates that if the Martyrs Lane site is to be safeguarded there will continue to be further detailed investigation of development impacts before the land is allocated and/or developed. The allocation of the land for development will set out the specific key requirements to make sure that detailed assessments (such as Transport Assessments) are carried out to fully assess the various impacts of development and identify appropriate measures of mitigation that will be put in place to address any adverse impacts. It is anticipated that more work will need to be done with partners such as the Surrey County Council as part of the review of the Core Strategy and/or Site Allocations DPD.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policy is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the

sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed. In preparing this report, Officers will be mindful that the Site Allocations DPD as a whole will need to meet the tests of soundness, and make recommendations accordingly.

The issues raised in the representation, including the merits of the 'dispersed site strategy', are noted and will weigh in the balance of considerations by Members. In response to specific points raised:

The Regulation 18 consultation Issues and Matters Topic Paper sets out in detail in Section 1 and 8 the evidence used to support the preparation of the Site Allocations DPD. This evidence includes an up-to-date Strategic Housing Market Assessment (SHMA) (2015). The Council can confirm that neighbouring authorities were consulted prior to the consultation (in October 2016). This matter is addressed in detail in Section 6 of the Duty to Cooperate Bodies Topic Paper.

Although the Officers dismissed parts of the site in earlier stages of plan preparation, the changing circumstances regarding the planning status of the McLaren sites post dates the Regulation 18 version of the DPD, and justifies the reconsideration of land to the east of Martyrs Lane as a reasonable alternative to be tested.

Officers would agree that although planning history of the site is a material consideration that needs to be taken into account, it was approved in an entirely different context, and for different uses, and there is therefore no presumption based on this planning history that housing at this location would be suitable.

The Council recognises that the site is in close proximity to the Horsell Common SPA. Section 16 of the Duty to Cooperate Bodies Topic Paper addresses this issue in detail. Natural England submitted a representation in response to the consultation. It does not have any objection in principle to the safeguarding of the site. It notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. This provision does not have to be in between the site and the SPA, as suggested in the representation. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed.

The Council's Community Strategy seeks to improve access to quality and affordable housing for local people and key workers. It is not unreasonable to assume that key workers at nearby major employers would benefit from local affordable housing at the Martyrs Lane site; nor is it unreasonable to assume that prospective employees would find a new community here attractive for the purposes of reducing their commute to work.

In terms of delivery and implementation: it is agreed that availability of land is a significant material consideration for the Council to take into account in deciding its preferred approach to safeguarding for the purposes of the Regulation 19 consultation. The land east of Martyrs Lane is in multiple ownership, and the New Zealand Golf Course and McLaren collectively owns a significant proportion of the land.

Footnote 11 of the NPPF provides clarity on what a deliverable site is. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Whilst five years is emphasised in the footnote, its relevance should be seen in the context of the details of the representations received from the owners of the land.

The New Zealand Golf Course has written to the Council and has made formal representation as part of the consultation to confirm that the part of the land that is in its ownership will not be made available now, in the future and never to meet future development needs. In this regard, there is no expectation for a change in their position within and beyond five years. The representations from the New Zealand Golf Course are addressed in full separately.

McLaren Technologies Group Limited has also made representations. Whilst it would generally support in principle the release of the land from the Green Belt, it would only allow its land holding to be used as a strategic employment site to support its own future expansion programme. McLaren will not allow its land to be used as envisaged in the consultation. If the Council were to decide not to release the land east of Martyrs Lane from the Green Belt, McLaren have provided reasons why its land should be designated as a Major Developed Site in the Green Belt. The representations from McLaren has been addressed in full separately.

The lack of availability of the above sites could cast doubt on the deliverability of the land if it is safeguarded. To put it into context, assuming the two sites will not be available to meet future development needs and the Surrey County Council's Waste Safeguarded Site is also not available, the residual land will only deliver about 300 dwellings (at 30 dph) as against the 1,200 dwellings that the Council wish to safeguard land. If the Waste Safeguarded Site is made available, there will be sufficient land to enable the delivery of about 600 dwellings at the same density. This is still significantly short of what is needed. Importantly, the Council has to make sure that any land that it safeguards would not lead to an isolated development within the Green Belt.

It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the land is the most sustainable when compared with the original six safeguarded sites.

With regards to the list of objections put forward in the representation at Appendix 1, the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses each of these issues in detail. This includes the issue of infrastructure delivery.

The Council will work constructively with infrastructure providers and authorities, such as Surrey County Council, to identify the necessary infrastructure to support the development of the Martyrs Lane site if it is allocated and/or developed. The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council also continues to work with neighbouring boroughs such as Runnymede and Surrey Heath to discuss and assess cross-boundary infrastructure requirements. The Councils are in the process of drafting a Statement of Common Ground about how to work together in the future to address cross-boundary strategic matters.

To conclude: as an advisory group, the LDF Working Group appropriately carried its duties by making recommendations to Council. The Group gave clear and specific reasons for its recommendation, and took into account all evidence collected in the preparation of the draft Site Allocations DPD up to that point. The Council took the Working Group recommendations into account before coming to its decision to consult on the land east of Martyrs Lane. All Members of the Council will once again have the opportunity to consider the representations to this consultation and decide which overall strategy they wish to publish for Regulation 19 consultation and submit to the Secretary of State for examination. Paragraph 182 of the NPPF requires the Council to submit a Site Allocations DPD for Examination that it considers is sound. That is exactly what the Council will do and this will minimise any risk of the DPD being found unsound. In particular, the Council would only safeguard land that it considers are the most sustainable based on proportionate evidence when compared against other reasonable alternatives.

The separate references to the Sustainability Appraisal scoring are noted and taken into account. As described in detail in the draft SA Report, an SA Framework was developed to provide a consistent basis for describing, analysing and comparing the sustainability effects of the options and various proposals of the Site Allocations DPD. Section 11 of the report describes in detail the SA methodology, including how the scoring works. The Council is confident that this methodology has been effectively applied and therefore no modifications are proposed, as follows:

SA Objective 1: opinion noted. The lack of availability of land does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. The scoring assumes that housing will be delivered as proposed.

SA Objective 2: opinion noted. The appraisal took all of the decision-taking criteria into account, and in the whole believes that development of the site presents an opportunity to improve health and wellbeing through improved accessibility to open space. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site; as well as public sector contributions. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

SA Objective 4: opinion noted. See comment above regarding social infrastructure. Implementation of design policies in the Development Plan will also ensure development is designed to reduce fear of crime.

SA Objective 5: opinion noted. See comment above regarding infrastructure provision.

SA Objective 6: opinion noted. Focusing only on the decision-making criteria, the potential loss of greenfield land versus the potential to support the use of and remediation of previously developed land led to a neutral score. The potential to remediate contaminated land – in particular the safeguarded waste site, and potential to support a mix of uses – was also taken into consideration.

SA Objective 7: opinion noted. However, the Council is satisfied that the necessary infrastructure to support the development can be achieved – see comment above.

SA Objective 9: opinion noted. Development Plan policies (CS7 and CS8) are specifically crafted to avoid harm to the SPA as a result of development. Development will only be permitted where the Council is satisfied that this will not give rise to a significant adverse effect upon the integrity of the SPA. Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy (which does not require SANG to be located between development and the SPA). Officers are confident that the requirements of planning policy and the SPA Avoidance Strategy will be met if the Council decides to safeguard the land for future development. In this regard, the scoring will not change.

SA Objective 11: see comment above on the provision of infrastructure.

SA Objective 15: opinion noted. See comment above on the provision of infrastructure.

SA Objective 16: opinion noted. The Council are confident that the development of the site would be supported by necessary social, physical and green infrastructure. Surrey County Council, for example, have indicated the requirement for an on-site primary school, thus improving access to and participation in education, contributing towards a positive score in the longer term. All of the decision-making criteria need to be considered.

**Contributor Reference:** 02376/1/001

**Customer Name:** Mr And Mrs Gerard And Margaret Mandeville

**Summary of representation:**

Supports substituting the six sites in the draft site allocation with land east of Martyrs Lane DPD but excluding building on New Zealand Golf Course.

A single site would provide some alleviation towards all infrastructure issues like affordable housing: schools: Doctor Surgeries: waste water and traffic problems etc.

It would be better served with public transport unlike the other sites. It would also have access to the main road via the nearby roundabout.

As part of the site is publicly owned it would help local tax payers.

It would have less impact on the residents and looks so much more feasible than the other six sites identified.

**Officer Response:**

Support noted.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste

safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from

various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day.

The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 01526/2/001  
**Customer Name:** Mr Mark Stevens

**Summary of representation:**

Woking Chamber's members were asked to provide responses to WBC's consultation on the site bounded by Martyrs Lane, in particular to reflect the impact on business if the proposal were accepted.

The majority of responses were concerned about the commercial impact on the town arising from the expected additional congestion on the A320. This might discourage businesses relocating to Woking and therefore be a disadvantage to local small businesses.

Impact of online shopping and whether there would be any local benefit of the development.

However, another respondent was in support of the Martyrs Lane site as the land area had previously received Planning Permission for a Technology Centre, and thus decision to remove from the Green Belt had already been taken.

The site is well served by the existing road network.

Whilst there are locally Listed properties in the vicinity, the land does not surround a Grade 2 Listed property as at Saunders Lane.

**Officer Response:**

In terms of the objection raised to the site due to the impact on the A320, the Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The consultation concerns the approach the Council should take with regards to safeguarded sites to meet future development needs between 2027 and 2040. Safeguarding of land is a means of ensuring that land that has been identified for longer term development needs beyond the Core Strategy period is protected from conflicting development. In this regard, the safeguarded land is not allocated for development at the present time. Its release for development will only be considered as part of a future review of the Core Strategy and/or the Site Allocations DPD. The overriding objective of this particular exercise and at this particular

stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of support for Martyrs Lane site.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

There are a number of locally listed buildings within the vicinity of the site, the closest is Blandings, Woodhambury and Woodbarrow, located adjacent to the southern boundary along Woodham Lane. However, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

**Contributor Reference:** 02418/1/001  
**Customer Name:** Ms Charlotta Snelgrove

**Summary of representation:**

Supports the proposal, however disagrees on building on Green Belt land as it will cause further problems in the future. The Council should choose Martyrs Lane as it will have the least impact on nature and residents.

Certain Members of the Council have bowed to the pressure of Burhill Estates who have been trying to sell the fields in Pyrford for decades, and pushed the fields to the top of the list for removal from the Green Belt. This is despite an independent report declaring these fields are the least suitable in the area to be built on. Decisions are financially motivated. The files for Martyrs Lane were hidden and should have been considered initially.

Green Belt land in Pyrford is actively used by walkers, runners, cyclists etc and has beautiful views over the Surrey Hills. This is not the case at the Martyrs Lane site.

Significant new development proposals in the Pyrford and West Byfleet areas will put a strain on existing infrastructure, without a further population increase.

Parts of the Martyrs Lane site are previously developed.

One site will allow economies of scale with infrastructure provision (roads, schools, doctor surgeries etc).

The New Zealand Golf Course does not need to be built on.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The decision to safeguard particular sites in the draft Site Allocations DPD is well evidenced. Section 10 of the Regulation 18 Consultation Issues and Matters Topic Paper provides a detailed account of the Green Belt boundary review procedure, and how the Members of the Local Development Framework Working Group were satisfied it had been prepared in accordance with the brief, and that it provides useful evidence to inform the DPD.

The Peter Brett report did actually recommend that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open

exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Officers did in fact consider parts of the Martyrs Lane site in the early stages of DPD preparation. Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. As noted above, the Green Belt boundary review, as well as the landscape assessment conducted by Hankinson Duckett, concluded that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

In 2016, a change in circumstances relating to planning approval at the McLaren site west of the A320 prompted Members to reconsider land to the east of Martyrs Lane as an alternative site for future development. The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. Detailed

reasons were put forward by Members of the LDF Working Group, and are available on the Council's website. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed. The conditions attached to the latest planning approval at the McLaren site west of the A320 (PLAN/2014/1297) presented a change in circumstance to justify the Martyrs Lane consultation. Representations received during the consultation will provide useful information to inform Members on their preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council recognises that there may be economies of scale in providing certain infrastructure. However, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material

considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect locally valued landscape features such as footpaths within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are situated.

Regarding the New Zealand Golf Course in the proposal: as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 01177/2/001  
**Customer Name:** Mr John Woolgar

**Summary of representation:**

The pending redevelopment of the Town centre and Broadoaks in West Byfleet, The A320 and Woodham Lane cannot cope with the amount of traffic and also the lost wildlife in the area.

**Officer Response:**

If the Council were to decide to safeguard this site or the other six sites, its development will take into account any development proposals in the vicinity of the site.

The matters of Wildlife and traffic have been addressed in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02419/1/001  
**Customer Name:** Ms Maureen Arnett

### **Summary of representation:**

Support the Martyrs Lane site.

Misinformation has been circulated about the Martyrs Lane (ML) site as to the number of dwellings needed which needs to be corrected. Up to 1,200 homes could be provided on part of this site – as opposed to the 3,000 over the total site that has been publicised.

The ML site, whilst currently classified as Green Belt, is well contained by existing urban and natural boundaries, urban Woking to the south and east; the A320 to the west which is far better able to cope with traffic volumes than surrounding roads at the other proposed sites and the Bourne stream to the north.

Planning permission to develop part of the site was granted in 2012

The top part of this site includes pre-developed land which is now semi derelict

There is no current public access to the ML site, unlike the other proposed sites

The ML site has no local or national landscape designations unlike the proposed Mayford or Pyrford sites

WBC's adviser's report describes the ML site as low in suitability for development whereas again Mayford and Pyrford are classed as very low in suitability.

WBC personnel acknowledged in 2015 that development at the ML site would merely impact on the landscape. By contrast they assessed the impact at all three of the alternative sites (Byfleet, Mayford and Pyrford) as very negative.

The possibility that more affordable housing could be incorporated into the project due to the land being less costly than the other sites.

Significant economic and social benefits at the single ML site which do not exist at the six other sites.

- o proximity to employment (St Peter's Hospital; McLaren & the Plant Agency at New Haw)
- o viable public transport which is absent at the other sites
- o economies of scale from using a single site
- o less traffic congestion; better safety and access during construction and when occupied.
- o direct road links via the A320 to Woking town centre and the M25
- o potential for superior infrastructure such as medical, schooling, waste water and improved public transport

- o part of the north of the site is publicly owned so the sale would benefit council tax payers
- o significantly fewer residents would be affected by a single site development

It is not necessary to include the New Zealand Golf Course in the development.

Martyrs Lane will provide the best benefits; have the least impact on residents and minimise disruption.

**Officer Response:**

The representation is correct, the number of new homes is 1200. It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose

and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst

this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02420/1/001  
**Customer Name:** Ms Carolyn McClean

### **Summary of representation:**

Support the Martyrs Lane site.

Misinformation has been circulated about the Martyrs Lane (ML) site as to the number of dwellings needed which needs to be corrected. Up to 1,200 homes could be provided on part of this site – as opposed to the 3,000 over the total site that has been publicised.

The ML site, whilst currently classified as Green Belt, is well contained by existing urban and natural boundaries, urban Woking to the south and east; the A320 to the west which is far better able to cope with traffic volumes than surrounding roads at the other proposed sites and the Bourne stream to the north.

Planning permission to develop part of the site was granted in 2012

The top part of this site includes pre-developed land which is now semi derelict

There is no current public access to the ML site, unlike the other proposed sites

The ML site has no local or national landscape designations unlike the proposed Mayford or Pyrford sites

WBC's adviser's report describes the ML site as low in suitability for development whereas again Mayford and Pyrford are classed as very low in suitability.

WBC personnel acknowledged in 2015 that development at the ML site would merely impact on the landscape. By contrast they assessed the impact at all three of the alternative sites (Byfleet, Mayford and Pyrford) as very negative.

The possibility that more affordable housing could be incorporated into the project due to the land being less costly than the other sites.

Significant economic and social benefits at the single ML site which do not exist at the six other sites.

- o proximity to employment (St Peter's Hospital; McLaren & the Plant Agency at New Haw)
- o viable public transport which is absent at the other sites
- o economies of scale from using a single site
- o less traffic congestion; better safety and access during construction and when occupied.
- o direct road links via the A320 to Woking town centre and the M25
- o potential for superior infrastructure such as medical, schooling, waste water and improved public transport

- o part of the north of the site is publicly owned so the sale would benefit council tax payers
- o significantly fewer residents would be affected by a single site development

It is not necessary to include the New Zealand Golf Course in the development.

Martyrs Lane will provide the best benefits; have the least impact on residents and minimise disruption.

**Officer Response:**

The representation is correct, the number of new homes is 1200. It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose

and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable

to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02385/1/001  
**Customer Name:** Ms Gillian Reid

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02399/1/001  
**Customer Name:** Ms Julia Hardy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02405/1/001

**Customer Name:** Ms Elisabeth Reid

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02412/1/001

**Customer Name:** Mr Allen Hodkinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02413/1/001  
**Customer Name:** Ms Angela Hodkinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02421/1/001

**Customer Name:** Alex Couch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02424/1/001

**Customer Name:** Mr Mike Cage

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02434/1/001

**Customer Name:** Shaun

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02446/1/001  
**Customer Name:** Mr Philip Tudhope

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02465/1/001

**Customer Name:** Jo Elphick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02469/1/001

**Customer Name:** Anna

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02496/1/001  
**Customer Name:** Mr Richard Meads

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02350/1/001

**Customer Name:** Ms Sandra Mathews

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02361/1/001  
**Customer Name:** Ms Jennifer Harper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02415/1/001  
**Customer Name:** Waverley Borough Council

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 02272/1/001

**Customer Name:** Mr Ivan Gale

**Summary of representation:**

Not able to accept the terms of this current consultation because the six sites have not been 'safeguarded' as implied by this consultation. They were proposed in the Regulation 18 consultation, but objections have not been answered. The choice is therefore a false choice which should not have been presented.

Object to the two sites in Pyrford being included in this consultation for the following reasons:

The Green Belt boundary review included the Pyrford sites in Parcel 9. It concluded that the fields serve two critical Green Belt purposes – firstly in restricting sprawl and secondly in safeguarding the countryside from encroachment. The report explains that by critical it means that the continued inclusion of this parcel within the Green Belt it is of paramount importance. It is the highest category of defence possible. For these reasons the parcel is identified by the report as having very low suitability as an area of search based on the assessment of greenbelt purposes.

The report also stated that the land is considered to be in the category of Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The exact agricultural quality of the land has not been established.

The parcel is identified as within or adjacent to 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. The escarpment is considered to be a key landscape feature in the Borough and this is the principle reason that the report considers there to be a major environmental constraint on developing the Parcel.

The rural character of the area would be harmed. The Green Belt boundary review concluded that Parcel 9 has a rural character which ranged from having no capacity to change to low capacity to change. The Parcel falls into the highest categories of constraint to development. Since the report Surrey County Council has conducted a Landscape Character Assessment which also concludes that the area is rural in character and that the fields are important in contributing to this feel.

The councils own sustainability appraisal states that both fields score double negatively in the category 'Conserve and enhance and where appropriate make accessible for enjoyment the natural, historic and cultural assets and landscapes of Woking.'

The decision to put forward the fields for removal from the Green Belt was taken on grounds of availability alone. GB13 wasn't recommended for removal by the Brett report and no subsequent evidence was produced to justify its inclusion. Ashley Bowes has stated:

'I am of the view that the draft DPD is unsound in its current form, in that contrary to s.19(2)(a) Planning and Compulsory Purchase Act 2004, proposed site allocations GB12 and GB13 are not

in accordance with national policy within the NPPF. In particular, the necessary "exceptional circumstances" to justify release of those sites from the Green Belt is not supported by the conclusions of the evidence upon which the Council rely. It is clear the evidence does not support the choice of the two fields.

The choice of the Pyrford fields is based on inadequate evidence and cannot be justified.

The two fields, as noted by the Green Belt Review, are not near a doctor's surgery , secondary school or train station. The primary school and nurseries are all oversubscribed.

Changes to the roads in the Pyrford area are not possible without harming the character of the area. The narrow roads are built on ancient trackways and contribute to the rural character of the area. The B382 Old Woking Road is already a severely congested road and it is uncertain what will be the impact of the enlarged International School (200 to 1100 pupils), development at Sheer House and Broadoaks in West Byfleet, plus possible development at West Hall and Sheerwater. The B367 which runs through the centre of Pyrford is already severely congested during the school run period. The Pyrford Neighbourhood Plan has identified the verges along this route as playing a significant role in contributing to the character of the village and therefore widening of the road is not an option. Pyrford is already under threat from a huge traffic increase from the proposed developments at Garlicks Arch near Burnt Common and the Former Wisley Airfield. The impact of these and other proposed developments will undoubtedly bring further traffic from Ripley via Newark Lane. No traffic studies have been conducted into the effect of all these developments.

The government Housing White Paper recommends higher density building. This is inappropriate in an area surrounded by Conservation Areas. The genuine need for smaller properties would be better met elsewhere.

The footpaths and bridleways in the area are recognised as being of special importance and are used for recreational purposes. The footpaths are ancient and afford attractive views, including uninterrupted views of the North Downs. The Heritage setting of Pyrford Village and the character of the area as enjoyed from the footpaths will be harmed by development of the two fields.

Particularly upset by your response to this:

During the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed.

Will pursue this matter with Surrey Wildlife Trust. There will undoubtedly be a loss of biodiversity regarding the birds and mammals which migrate between Pyrford Common and the farmland. Has spent many hours observing the farmland birds using this area and it is impossible to mitigate this loss.

The south east is an area of high water stress and sewerage systems in the area are considered adequate only to 2026. There has been no serious exploration as to whether the already creaking water supply and sewerage systems could cope with the increased demand. There are known sewerage problems in this area and exacerbating this will affect the water quality of the River Wey.

Background air quality is not considered and poor air quality results in many thousands of deaths every year. The impact of increased traffic on air quality must be taken more seriously.

Objects to the Safeguarding of Green Belt Land.

The government White Paper on housing states that 'authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.'

The Council has identified Green Belt land which is capable of delivering at least 900 dwellings during the current plan period, well over the 550 homes targeted in the Core Strategy. The intention to revise boundaries such that a further 1,000 units could be delivered in the Green Belt is a decision which cannot be justified.

The eleventh hour inclusion of land to the east of Martyrs Lane as a potential safeguarding site proves that safeguarding is an inadequate method of producing enduring Green Belt boundaries. Safeguarding results in the blighting of Green Belt land. There is also a great danger that because of the Duty To Cooperate, that these sites will be brought forward to satisfy housing need in other areas. This contradicts the government's commitment to protect the Green Belt, reaffirmed in the Housing White Paper.

#### **Officer Response:**

In the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This is set out in further detail in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Section 1.0 and 2.0.

The preparation of the Site Allocations DPD is the formal process that will ultimately confirm the status of each of the sites designated within it, including those that are earmarked for safeguarding. The sites that have been identified in the Regulation 18 version are those that the Council had proposed for the purposes of safeguarding if it is examined and approved. The Land to the east of Martyrs Lane Consultation Document is careful to use the term 'proposed sites' and the introduction to the draft Site Allocations DPD also makes it clear that the sites are proposed at this stage.

The Council published the draft Site Allocations DPD for public consultation between 18th June and 31st July 2015. The publication of the draft document was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document clearly identified a number of sites that would be safeguarded for future

development needs between 2027 and 2040. To clarify, the draft Site Allocations DPD safeguarded the following sites for future development needs:

GB4: Land south of High Road, Byfleet

GB5: Land to the south of Murray's Lane, Byfleet

GB9: Woking Garden Centre, Egley Road, Mayford

GB10: Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford

GB11: Land to the north west of Saunders Lane, Mayford

GB12: Land rear of 79–95 Lovelace Drive, Teggs Lane, Pyrford

GB13: Land east of Upshot Lane and south of Aviary Road, Pyrford

As well as clearly identifying specific sites for safeguarding, Paragraph 216 of the National Planning Policy Framework (NPPF) states that at this stage of the process, the document can be afforded very limited weight in the determination of planning applications. Therefore despite not being an adopted Council document, it does form part of the emerging Development Plan for Woking Borough.

Based on the above, whilst the Site Allocations DPD has not been adopted by the Council at this stage it is clear that the formal plan making process has started and that the Martyrs Lane consultation document was correct in identifying the original sites as 'safeguarded sites in the draft Site Allocations DPD'.

Objection to the possible safeguarding of Green Belt land in Pyrford for future development needs (referred to as GB12 and GB13) is noted.

As set out in table 3.2 of the Green Belt boundary review, all parcels of land except for parcels 3,5,6 and 29 of are significant, major or moderate importance to the purposes of Green Belt to some degree. The purpose of the Site Allocations DPD is to allocate sites for development, safeguard land for future development needs and allocate sites for SANGs (suitable alternative natural green space). This plan led approach will make sure that any land released for development is the most sustainable when compared against reasonable alternatives. If the Council were to go against the recommendations of the Core Strategy Inspector and not prepare a Site Allocations DPD, then it would increase the risk of speculative and opportunistic unplanned development in the Green Belt based on a lack of housing supply. This could, based on the Council's evidence, have a far greater impact on the purpose and integrity of the Green Belt compared to the sites identified by the Council. This unplanned growth could also have significant impacts on the provision of essential infrastructure and services. It is therefore critical that the Council proceeds with the Site Allocations DPD process and identifies specific sites in both the existing urban areas and the Green Belt for existing and future development needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this

recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The reasons why the sites scored a double negative for conserving and enhancing the natural, historic and cultural assets and landscapes of Woking are clearly set out in the SA. The SA however identifies that the impacts could be mitigated by detailed site layout and design to retain as much openness as possible and landscape buffers to reduce the visual impact of development. For GB12 in particular, this is similar to the recommendations set out in the Green Belt boundary review. The conclusions of the Green Belt boundary review state that 'the landscape assessment notes that this site (GB12) is more discrete, partly contained by trees and set beyond the prominent slopes to the east. The site is therefore under consideration for release from the Green Belt'.

The impact of development on the escarpment can be reduced by reducing the amount of residential development and increasing the proportion of open space allocated for GB13, as set out in the SA. The matters regarding detailed site layout and the provision and distribution of open space within the site would be considered and dealt with at the development management stage.

The Surrey Landscape Character Assessment defines the landscape character of the wider Surrey area and provides a detailed assessment of the land to the south-east of Woking (parcel SS10: Woking to Byfleet Settled and Wooded Sandy Farmland) which includes both GB12 and GB13. It does not specifically assess these two sites as the assessment is a strategic one and not site specific. Nevertheless the Evaluation and Guidance of parcel SS10 makes recommendations of how development could be appropriately accommodated within the assessment parcel. Based on this information, the Council is satisfied that development can be achieved within sites GB12 and GB13 without creating a significant adverse impact on the landscape character of the wider area as well as the specific heritage and landscape designations on and in close proximity to the sites.

Whilst sites GB12 and GB13 score negatively on some of the sustainability appraisal criteria, it is important to consider their scoring across all 17 sustainability criteria as well as considering these scores against the other sites assessed by the Council.

Regarding the representation on the land availability, availability of land is a significant material consideration for the Council to take into account in deciding its preferred approach to safeguarding for the purposes of the Regulation 19 consultation. Paragraph 182 of the NPPF deals with examination of local plans and it requires the Council to only submit a plan for examination which it considers sound. Amongst other things, to be sound, the plan:

- o Should be deliverable over its period;
- o Should be the most appropriate strategy when compared against the reasonable alternatives, based on proportionate evidence.

Footnote 11 of the NPPF provides clarity on what a deliverable site is. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Whilst five years is emphasised in the footnote, its relevance should be seen in the context of the details of the representations received from the owners of all seven proposed safeguarded sites at both the Regulation 18 stage and Martyrs Lane consultation.

As part of the Site Allocations DPD process, the Council has written to landowners of all of the sites in the DPD, to confirm the deliverability of the sites included within it. As set out in the draft document, the six proposed Regulation 18 safeguarded sites are considered to be deliverable based on the information submitted by the landowners. As part of the Martyrs Lane consultation, the Council has written to the various landowners within the site boundary. For information, the New Zealand Golf Course and McLaren Technologies Limited have confirmed that the land in their respective ownership will not be made available for residential development. It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the Martyrs Lane site is the most sustainable when compared with the original six safeguarded sites.

The views of Councillor Bowes on the soundness of the draft Site Allocations DPD have been considered by the Council at its meeting on the 20th October 2016. The Council, on the recommendations of the LDF Working Group, took the decision to consult on the land to the east of Martyrs Lane as a possible substitute for the six sites originally identified for safeguarding in the Regulation 18 version of the Site Allocations DPD. The consultation will inform the Council's decision on its preferred safeguarding option for the Regulation 19 consultation and subsequent Examination.

Regarding the lack of infrastructure in Pyrford, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

As set out in the list of transport evidence base documents above, the Council has carried out an assessment of the development impacts of the Site Allocations DPD in combination with the development proposals within the wider area. This study is on the Council's website.

Regarding the Housing White Paper: Fixing Our Broken Housing Market, the White Paper sets out a number of proposed amendments to the NPPF in paragraph 1.53. The first proposed amendment seeks to increase housing density where there is a shortage of land for meeting identified housing need and the second proposed amendment seeks to increase residential density in urban locations that are well served by public transport. However it should be noted that the third proposed amendment set out in the White Paper seeks to ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs. This is broadly consistent with the policies of the Core Strategy and the Development Management Policies DPD as well as the design principles set out in the Working Design Supplementary Planning Document (SPD). Therefore development of any of the proposed Green Belt sites, including those proposed to be allocated for safeguarding, should be designed to the highest design standards and ensure that housing density does not affect the quality and character of an area and the general well-being of residents.

The heritage and amenity value of the sites are noted and the relative merits of the sites will be considered by Members as part of the Site Allocations DPD process. These landscape features are already highlighted in part in the Surrey Landscape Character Assessment (2015). Whilst this part of the Green Belt provides amenity/recreation value, the overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

Regarding the representation on biodiversity, the Council has consulted with the relevant statutory and non-statutory consultees on this matter and their representations have been taken into account in preparing the Site Allocations DPD. The Council is committed to working with these consultees during the plan making process and beyond to ensure that any of the sites allocated or safeguarded for development do not have a significant harmful impact on biodiversity that can not be mitigated.

The Council has consulted with the relevant utility providers as part of the on-going Site Allocations DPD process. As specifically set out in paragraphs 3.9 and 3.10 of the Regulation 18 consultation Issues and Matters Topic Paper, there is no risk to water supply over the plan period as a result of planned development, whilst Thames Water has provided specific wording

to be incorporated into the key requirements of specific sites to ensure that wastewater and sewerage infrastructure needs of development are fully assessed and where necessary mitigation provided as part of the development management process.

The environmental implications of development, regardless of whether it is in Pырford or elsewhere, will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

The requirement to safeguard land for future development needs as part of the plan-making process is set out in paragraph 85 of the NPPF, in particular bullet points 3, 4 and 5. As set out in the draft Site Allocations DPD, the land to the east of Martyrs Lane consultation paper and the Regulation 18 consultation Issues and Matters Topic Paper, the Council is seeking to establish the principle of safeguarded land to ensure the development plan is in general conformity with the requirements of the NPPF. The release of these proposed safeguarded sites for development will only be considered following a review of the Core Strategy and or the Site Allocations DPD. The Council has also sought legal opinion on the requirement to safeguard land for future development needs. The legal opinion, as set out in the Minutes to the LDF Working Group (1st July 2016), stated that 'It has been suggested that the Council does not need, either through the Green Belt boundary review or the draft Site Allocations DPD, to identify land or sites to meet the projected housing need for the period 2027 to 2040. However, I consider that, hitherto, the Council has clearly adopted the right approach and would be committing a justiciable error if it proceeded otherwise'. It concluded by stating that 'The Council has adopted the correct approach in seeking, through the Green Belt boundary review and the Site Allocations DPD to identify land or sites to meet the projected housing need for the Borough in the period between 2027 and 2040'. The Council therefore considers the Site Allocations DPD, and in particular the safeguarding of land for future development needs between 2027 and 2040, to be consistent with national planning policy.

Whilst the Housing White Paper reconfirms the government's commitment to protecting Green Belt land, the White Paper does not propose any material change in national Green Belt policy. The Core Strategy was prepared and found sound in the context of the NPPF and in particular the Green Belt policies within it.

Matters regarding the Duty to Cooperate have been addressed by the Council in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 02305/1/001  
**Customer Name:** Ms Karen Blackwell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02326/1/001  
**Customer Name:** Burhill Group Ltd

### **Summary of representation:**

Object to the proposal.

The Housing White Paper (February 2017) proposes amendments to Green Belt policy. Although not yet policy, it is essential that the Council pay regard to the likely direction of travel of policy. It should respond to paragraphs 1.38 and 1.39 of the White Paper relating to Green Belt reviews.

A further White Paper change proposes Ancient Woodland and aged or veteran trees are added to footnote 9 of the NPPF (regarding where development should be restricted). The significance of trees on the NZGC has yet to be assessed – it is essential this exercise be undertaken.

Promoted both sites in Pyrford at Regulation 18 consultation stage as they accord with NPPF paragraph 47 guidance i.e. they are suitable, achievable, deliverable and viable. In response to the consultation, on 1 July 2016 Officers recommended to the LDF Working Group the DPD should progress as per original recommendations.

This latest consultation on a site already appraised is a waste of limited public resources brought about to delay unnecessarily the plan-making process. If this undeliverable and less sustainable site is progressed, the DPD would be found unsound at Examination as it would not be justified, effective or positively prepared (the final one is most pertinent given the proposal came about as a last minute u-turn, unsupported by the Council's own evidence base). Neither professional study assessing the release of this land has supported it – a highly material consideration. It would therefore be found unsound at Examination.

The approach leading to this proposal is flawed. The LDF Working Group ignored the advice of the Head of Planning and Deputy Chief Executive, who advised at the meeting (as minuted) that this area of land was not recommended in the Green Belt boundary review (it had been rejected by the review) nor the Sustainability Appraisal (SA); and that it was not known whether the NZGC would be available for development and therefore be deliverable. Martyrs Lane does not score as well in the SA as the other sites which it is suggested it replace. The consultation is thus not required or necessary because the site is not suitable, available, or achievable. The constraints to development of the site are not matters that can be overcome, so it should be rejected by the Council in favour of existing sites which scored more highly in the SA. Notwithstanding the concerns of the Head of Planning and Deputy CEO, the LDF Working Group resolved to consider the development potential of Martyrs Lane.

The Green Belt boundary review concluded at paragraph 3.5.11 that removal of any of this land would leave an area of development unconnected to the urban area, and make a significant incursion into the Green Belt. Parcel 2 was therefore not recommended for removal.

The NZGC should have been contacted after the July Working Group meeting to see if it would be available. Such a simple query would have saved time, resources and formed an important part of the evidence base.

Cllr Bowes is biased towards his constituents living close to some of the originally proposed sites.

The Hankinson Duckett Landscape Assessment and Green Belt Review and SCC Strategic Transport Assessment reach the same conclusions as WBC's officers and Peter Brett Associates, in that the land at Martyrs Lane is not suitable for release from the Green Belt. This further evidence has also been ignored by the Council. The Landscape Assessment concludes that both parcels are critically important in their contribution towards the purposes of the Green Belt in question. It also recommends further work to determine the quality of the internal vegetation and its landscape quality in comparison with the adjacent SPA before the site could be allocated – this has not yet been done, yet the Council progressed to this consultation. No justification has been given stating why this recommendation has been ignored. Despite this, the Council's own officers have appraised areas of the site who state in the LDF Working Group report that on landscape grounds the site is less well suited to development than a number of originally proposed sites. All this professional advice has been ignored by the Working Group. Added to this, BGL's landscape consultants professionally assessed the land east of Martyrs Lane in terms of its contribution to Green Belt purposes, and found both parcels perform a very strong contribution in preventing urban sprawl, coalescence and safeguarding the countryside.

The constraint of the TBH SPA needs to be addressed. A survey of trees needs to be undertaken, particularly to identify veteran or aged trees.

The results of the SCC Addendum Report to the Strategic Transport Assessment led officers to conclude (as minuted) that the suggested option of providing 900 or 3000 additional dwellings would create considerable more impact than other smaller development sites as proposed in the DPD. Additional concerns regarding traffic impacts on air quality have been ignored.

BGL commissioned its own assessment of highways impacts of the proposal, concluding that development of the site would have a detrimental impact on local junctions, such as the Six Crossroads junction and on several sections of the local highway network and existing transport issues would be exacerbated.

Despite the Head of Planning's advice, based on earlier and these latest studies, that the Martyrs Lane site should not be safeguarded, this recommendation was not accepted, suggesting the Council had decided on this course of action irrespective of the evidence it had called for, which would appear to make it inevitable that the Plan will be found unsound at Examination. Although initial recommendations to the Council which called for the Martyrs Lane site to proceed to Regulation 19 consultation were amended in favour of a bespoke round of consultation, it is considered that this consultation exercise is a sham (although it is hoped

that this exercise merely genuinely serves to re-enforce that the proposed substituted site would not form the most appropriate strategy).

Agree with the findings of the HDA study:

- the parcel is of critical importance to the purpose of checking unrestricted sprawl of large built-up areas;
- the parcel is of critical importance in preventing neighbouring towns merging into one another (the site would reduce the separation between Woodham and Ottershaw to 1km from 1.9km);
- the land is situated in a very rural area and development would diminish its countryside characteristics – the parcel is of critical importance in assisting in safeguarding the countryside from encroachment;
- whilst there is limited contribution towards preserving the setting and character of a historic town, the wider rural setting of the site should be considered e.g. the character and distinctiveness of the SNCI and Horsell Common;
- the NZGC assists in safeguarding the countryside from development and encourages the recycling of derelict and other urban land (whilst the NZGC could be defined as an urbanising use, it is an entirely appropriate use in the Green Belt).

The loss of the golf course would impact on the community as it would result in the loss of a sports facility.

There would also be loss of woodland and heathland which support the SPA to the west, which would impact on the environment, which is not in accordance with paragraph 9 of the NPPF because it will not conserve or enhance the natural environment which has been identified to be of high value. It would have a harmful impact on an SSSI and SPA, and may impact on valuable trees (as per White Paper proposals). It would also therefore conflict with paragraph 10 as it would not be sustainable development. The promotion of unsustainable development conflicts with paragraph 14 of the NPPF. The NPPF requires sites to be allocated where significant adverse impacts are avoided. They can be avoided by not allocating this site for development.

The proposal does not rely on a robust evidence base and conflicts with NPPF guidance on the preparation of development plans.

The proposal is neither deliverable or achievable (paragraph 47 of the NPPF).

It is not consistent with guidance in the NPPF on defensible, long-term boundaries and safeguarded land (paragraph 85).

Part of the site is in flood zone 2 or 3. Alternative sites exist that are not in the floodplain, and accord with NPPF guidance.

Both Surrey Heath Borough Council and Runnymede Borough Council have objected, which forms a material consideration – they both challenge the approach taken by WBC on a number

of grounds. The Runnymede Officer's report to its Planning Committee on 15 February exclaims regret that it hadn't received earlier notification of WBC's proposals and questions whether WBC has satisfactorily met the legal test described by the Duty to Cooperate. It also questions whether the proposal is sufficiently justified in line with Woking Core Strategy and relevant national policy and guidance, in that there has been no material change in circumstances in Planning terms since the publication of the draft Site Allocations DPD and its Regulation 18 consultation, where assessments rejected parts of the site. Inclusion of the site is considered to result in urban sprawl and merging of towns. Runnymede is also concerned with congestion of the A320, taking into account cumulative impacts from the Fair Oaks and Longcross proposals.

The recommendations of the Council's own Head of Planning should form the basis of the Plan, which are supported by the Council's own consultants, including Surrey County Council.

**Officer Response:**

Objection is noted.

Officers are aware of the proposals in the Housing White Paper. It is important to highlight that the Housing White Paper does not seek to change the direction of national policy as set out in the NPPF, and neither is it an in-principle new policy. It is only intended to clarify what the existing Green Belt policies mean in practice. Woking Borough Council had always understood the interpretation of the national policy on Green Belt and is already practicing what the White Paper is proposing and as such there will be no need to carry out any further work as suggested by the representation. The Council has sought further clarification on what the compensatory improvements to remaining Green Belt would be in practice in its response to the consultation on the White Paper. Even then, the Council can demonstrate that it can and is meeting this particular requirement.

The NPPF and White Paper both offer the same strict protection to the Green Belt. The principle that once established the Green Belt boundaries should only be altered in exceptional circumstances through the review of the Local Plan has not changed. The Council has rigorously applied this principle to underpin the preparation of the Core Strategy and the Site Allocations DPD.

Paragraphs 1.38 and 1.39 of the White Paper propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined all other reasonable options for meeting their identified development requirements – which the Council has already demonstrated. The Strategic Housing Land Availability Assessment (SHLAA), the Employment Land Review and the Employment Topic Paper are evidence to demonstrate the assessment of brownfield sites. The Core Strategy policy CS1: A spatial strategy for Woking Borough, and its reasoned justification, seeks to maximise the use of brownfield land. The high indicative densities set out in Policy CS10: Housing provision and distribution, also reflects this principle. Also contributing to the comprehensive assessment of brownfield sites for the preparation of the draft Site Allocations

DPD is the Sustainability Appraisal Report, which assesses all reasonable alternative brownfield sites in a consistent manner against a set of sustainability objectives.

There is therefore a clear and strong evidence base and policy framework to prioritise and support development on previously developed land at high densities subject to character and environmental considerations. The Council does not need to do any further work in response to the White Paper.

The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees as set out in the White Paper. This is addressed in further detail below.

With regards to the approach taken by the Council: the Council is transparent about the conduct of its meetings and has published the Officers' advice on the safeguarding of the land east of Martyrs Lane. Both Officers and Members agreed that the consultation on the land east of Martyrs Lane was necessary and the representations that are received during the consultation will be a source of relevant information to inform the subsequent stages of the Site Allocations DPD process. Whilst it is clear that the LDF Working Group did not accept the entire recommendations of Officers, as quoted in the representation, it is clear from the Minutes of the meetings that they carefully considered the report and advice of Officers, including the Deputy Chief Executive and Planning Policy Manager, before reaching their recommendations. The Working Group also had all the necessary evidence before them to inform their recommendations, but it should be accepted that different judgements could be made on such a critical issue, and the Working Group clearly justified their recommendations.

The Officers report and its recommendations therein have not in fact been ignored by the Council as suggested in the representation: the Council has not yet made any decision on the Officers report or the recommendations of the Working Group. It has rightly reserved its right and authority to do so after careful consideration of the representations received during the Martyrs Lane consultation. The request for further consultation was appropriate and justified to aid informed decision making. The Working Group is set up to scrutinise Officers reports and to make recommendations to the Council or other relevant decision making committees of the Council. The task and the action that the Working Group took regarding its recommendations on Martyrs Lane are therefore in line with its responsibilities. The Working Group provided reasons for their recommendations.

It is not incorrect to state that Cllr Bowes made a recommendation to Council that the Regulation 19 consultation proceed whereby the Martyrs Lane site is safeguarded: in fact he presented an amended recommendation to Council at its October meeting recommending that a further public consultation exercise take place in respect of the possibility of substituting the six previous sites with the land to the east of Martyrs Lane, and that the responses would be considered to help determine the contents of the Regulation 19 version of the DPD. Appropriate procedure has been followed in this regard. Council as a decision making body is yet to make its decision before consulting on the Publication version of the Site Allocations DPD (Regulation 19). Councillor Bowes has also been transparent about his proposed amendment at the Working Group and at Full Council. There is nothing improper about his conduct in this regard. He provided clear reasons for his amendment and it will be up to the

Council to judge whether or not the recommendations of the Working Group are rational, taking into account all available evidence, including that referred to in the representation.

It is important to emphasise that the decision to consult on the possibility of safeguarding the land east of Martyrs Lane was made by a vote of Full Council and not by the LDF Working Group. As an advisory Group, the Working Group appropriately carried its duties by making recommendations to Council. The Group gave clear and specific reasons for its recommendation. The Council took them into account before coming to its decision to consult on the land east of Martyrs Lane.

A change in circumstances that occurred since the Regulation 18 version of the Site Allocations DPD was published led to the LDF Working Group recommendation. At the time of the Green Belt boundary review and the Regulation 18 consultation, the part of the land in ownership of McLaren had planning approval for 60,000sq.m of applied technology centre (ref. PLAN/2011/0823) and was therefore not assessed on its own or as part of a comprehensive development of the total area. Since then, McLaren has got a similar planning approval (albeit 8,000sq.m less floorspace) to consolidate their operations at their existing site west of the A320 (ref: PLAN/2014/1297). Part of the condition for the new planning permission is that the planning approval on the land east of Martyrs Lane will be revoked when development commenced at the existing site. This is a significant change of circumstances that was not previously considered, and justified the testing of this land in combination with the other adjacent sites as a reasonable alternative. The LDF Working Group gave clear reasons why the land should be identified for consultation, following this change in circumstances, which is documented and on the Council's website. It is therefore incorrect to suggest that there was no proper consideration or notification about why the site was identified for consultation.

The LDF Working Group considered the Officers report on the analysis of the Regulation 18 consultation at its meeting in September 2016. It made its recommendations for the Council to consider at its meeting on 20 October 2017. The Council could not have consulted on what was merely a recommendation of the Working Group until it had considered the recommendations and made a decision. It was unfortunate that the New Zealand Golf Club could not be consulted earlier as suggested in the representation. Nevertheless, the Council did its best to consult the Club as soon as it was reasonable to do so after the Council had made the decision to consult on the recommendations of the Working Group. In this context, there was nothing deliberate or improper for not consulting the Club sooner.

The Council acknowledges that the New Zealand Golf Club is a significant landowner within the land east of Martyrs Lane and is aware of its confirmation that the land in its ownership will not be made available for the future development proposals of the Council. The availability of the land is a material consideration for the future deliverability of the land as highlighted by footnote 11 of the NPPF. It is proposed that if safeguarded, the land will be required for development between 2027 and 2040 and the NPPF highlights that to be deliverable, there should be the prospect that the housing will be delivered on the site within five years. In this particular context, the New Zealand Golf Club's representation demonstrates that there is no prospect of the land ever being made available now or in the future between 2027 and 2040.

For information, McLaren has also made representations to clarify that they do not object in principle to the safeguarding of the land to meet future development needs but only on condition that the part of the land in their ownership is allocated as a strategic employment site to meet the specific business needs of McLaren. Without both parcels of land, Officers accept that it would be unlikely that 1,200 new dwellings could be achieved on the land. This is a matter that the Council has to take into account when deciding its preferred approach to safeguarding.

The ultimate goal that should drive the Council's overall decisions about the preferred approach to safeguarding should be the need to achieve sustainable development and the robust evidence to justify its decisions. In this regard, if the Council decides on the available evidence that the land east of Martyrs Lane is the most sustainable to meet the future development needs of the borough, the lack of availability of parts of the land should not be an absolute constraint to the development of the entire land. The Council has Compulsory Purchase Powers that it could choose to use to acquire land for common good, and the appropriate legal advice will be sought in this regard if necessary. This would facilitate the deliverability and achievability of the site in accordance with paragraph 47 of the NPPF, as cited in the representation.

It is important to clarify that the Council has not yet made any choice to safeguard the land east of Martyrs Lane. It has only rightly consulted on the possibility of substituting the land east of Martyrs Lane for the six sites that were originally published as part of the Regulation 18 consultation of the Site Allocations DPD before it decides on the more sustainable of the two options. The Council has said that it will make the choice about the preferred approach to safeguarding after careful consideration of the representations received during the Martyrs Lane consultation, in addition to the evidence cited in the representation including the Green Belt studies, Sustainability Appraisal, and transport assessments. Whilst availability of land is a material consideration for the deliverability of any proposal, on its own, it should not be the only overriding consideration to outweigh all other benefits, including the evidence from the public consultation exercise and other sustainability factors. The consultation was therefore justified on the basis of the evidence it could provide to inform key decisions of the Council. Paragraph 182 of the NPPF deals with the examination of Local Plans. It stresses that to be found sound, a Local Plan amongst other things must be justified. The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. In this context, it would have been irresponsible of the Council if it did not at least consider the land east of Martyrs Lane as a reasonable alternative in the light of the changing circumstances regarding the part of the land in the ownership of McLaren which occurred after the Regulation 18 consultation, the need to assess the land in a comprehensive manner and the apparent need to ensure a defensible Green Belt boundary after the release of Green Belt land. The delivery of the Core Strategy will impact on all aspects of life of people who live and work in the borough. In this regard, Members and Officers of the Council has a duty to familiarise themselves with all the necessary information that might be relevant to inform its decisions about the Site Allocations DPD, which is one of the key means for delivering the Core Strategy.

Paragraph 80 of the NPPF defines the five purposes of the Green Belt, as referred to by the representation. Of particular relevance to this representation are:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

As highlighted in the representation, the Council has carried out the following two studies that assessed the site against the above purposes of the Green Belt.

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the studies, the Council would agree with the representation that the land to the east of Martyrs Lane is important in its contribution towards the purposes of the Green Belt, in particular, its contribution towards checking urban sprawl, preventing settlements merging and safeguarding the countryside. This is a matter the Council will have to weigh in the balance in its decision about the preferred approach to safeguarding. The Landscape Assessment also assessed the land in terms of its contribution towards preserving the setting and special qualities of historic towns and in assisting urban regeneration by encouraging the recycling of derelict and other urban land. The land was found to have slight/negligible importance to the former purpose as it does not contribute to any historic setting, physically or visually, with the exception of the woodland setting of Horsell Common. The wider rural setting, as referenced in the representation, was taken into account in the assessment. The land was also found to have slight/negligible importance in assisting urban regeneration by encouraging the recycling of derelict and other urban land. The assessment took the golf course – as an urbanising land use – into account in reaching this conclusion. It was considered that the degree of contribution towards these purposes were on balance, not considered relevant to the overall assessment of the Green Belt purposes, in contrast to the critical importance of the land's contribution to the first three purposes referred to above. Nevertheless, Members can of course take into account the full conclusions of the Landscape Assessment, including the negligible contribution the site makes towards the fourth and fifth purposes of the Green Belt, in reaching their decision.

It should be noted that if the representation argues that detrimental impacts on the wider rural setting of the Martyrs Lane area be considered under the fourth Green Belt purpose, this should equally be applied to the previous six sites that were considered. However, Officers agree with Peter Brett's interpretation in paragraph 3.2.25 of the report in that the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant because by definition Woking and its villages are not classified as historic towns. See Section C of the Regulation 18 consultation Issues and Response Topic Paper for further details.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development.

Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

It should be noted that the Council carried out the transport assessment to quantify and forecast vehicular trips that would be generated by various development options to help determine appropriate measures of mitigate to address the adverse impacts of proposed development, including impacts on air quality. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measures that would be necessary to bring forward the development. The Council has not ignored the findings of the studies: the Council accepts that the safeguarding proposals would lead to increase in traffic as demonstrated by its own studies, and mitigation will be needed to address that. It is working with the relevant bodies to determine the appropriate mitigation measures to enable the sustainable delivery of the proposals.

The Council has robust policies to manage air quality impacts as a result of development. In particular, Policy DM6: Air and water quality of the Development Management Policies DPD sets out strict air quality standards for development to meet. There are other policies such as policies DM5, DM7 and DM8 of the development Management Policies DPD that would apply to manage other sources of pollution as a result of development. Officers are satisfied that if the site is to be safeguarded it can be delivered without unacceptable risk to air quality.

The Council acknowledges that the land east of Martyrs Lane is used for sports, including the New Zealand Golf Course, and that proposed safeguarding of the site could potentially lead to the loss of this facility. From the available information, it is clear that the proposal would lead to the loss of an existing operational sports facility with a history to protect when there is a presumption against the loss of such facilities in both the NPPF and local policy. This is a key consideration to inform the decisions of the Council. The Council has received a representation from Sport England which it will take into account – this can be accessed for further information on this issue.

With regards to impacts on the natural environment, including woodland, trees of historic value, and heathland, as cited in the representation, the land is not covered by any absolute environmental constraints. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The site would have been designated as SPA by Natural England if any presence of Dartford Warbler and Nightjar were significant enough to justify designation. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity assets are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD. The Council accepts that it has not carried out a detailed assessment of landscape features on the site, including trees and woodland, and recognises the importance for doing so. However, the appropriate time to undertake such a study would be at the development management stage. The land will only be released for development as part of the review of the Core Strategy and or the Site Allocations DPD, and that will be the most appropriate time to set out the key requirements for any development to be acceptable. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Council accepts and has always acknowledged that the SPA should be accorded the uppermost environmental protection under the European Union Directive. The importance of the SPA and the SSSI is within the hierarchy of environmental designations is acknowledged in Policy CS7: Biodiversity and nature conservation of the Core Strategy. Policy CS8: Thames Basin Heaths Special Protection Areas of the Core Strategy is a specifically crafted policy to avoid harm to the SPA as a result of development. The policy takes a precautionary approach to the protection and conservation of the SPA and development will only be permitted where the Council is satisfied that this will not give rise to a significant adverse effects upon the integrity of the SPA.

The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided adequate contributions are made towards the provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the site. Officers are confident that the above requirements will be met if the Council decides to safeguard the land for future development.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected, and thus comply with national and local planning policy. Natural England does not have any objection in principle to the safeguarding of the site. It notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation.

In terms of sustainability of the site, the Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently of the Site Allocations DPD are managed to help achieve sustainable development. The outcome of the appraisal demonstrates that there are a number of negative, positive and neutral impacts for developing the site. The same Sustainability Appraisal Framework had been used to carry out a SA of the originally proposed six safeguarded sites. The SA Framework enables consistent information to be gathered to make comparative judgements between the sites. The Council therefore has significant information to inform decisions about the most sustainable site to safeguard for future development. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives, and thus comply with national planning policy as referenced in the representation. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

The representation believes the proposal is not consistent with the points in paragraph 85 of the NPPF regarding defensible, long-term boundaries and safeguarded land. The Council has recognised the need to plan beyond the Core Strategy period. The whole essence of safeguarding land in the Site Allocations DPD is to enable long term future development needs beyond the Core Strategy period to be met without having to review the Green Belt boundary again during this plan period. The approach taken in preparing the Site Allocations DPD will help ensure the enduring permanence of the Green Belt boundary well beyond the current plan period. Officers have purposefully included land in the site which is bounded by physical features such as the River Bourne to ensure a strong, defensible Green Belt boundary could be drawn. This is positive planning in line with the requirements of paragraph 85 of the NPPF.

Development at Martyrs Lane will only be concentrated on the part of the land in Flood Zone 1. This is made clear in the consultation document. The areas in Flood Zones 2 and 3 are included in the safeguarding area to ensure a defensible Green Belt boundary. As far as flood risk is concerned, there is no obvious significant difference between the two safeguarding options.

Runnymede Borough Council and Surrey Heath Borough Council have indeed made separate representations, and their concerns have been fully addressed in the Council's response available in the Duty to Cooperate Bodies Topic Paper.

Officers strongly disagree with their assertion that the Council has not met its requirements for the duty to cooperate by not consulting Runnymede and the neighbouring authorities prior to the consultation. The claim is factually incorrect. The Council resolved to consult on the possibility of substituting the land east of Martyrs Lane for the six original safeguarded sites at its meeting on 20 October 2016. Runnymede Borough Council and the other neighbouring authorities were notified of the Council's decision soon after that on 24 October 2016. The Council had not previously considered this matter. The proposal was referred to Council for consideration by the LDF Working Group and the 20 October 2016 meeting was the first time the Council had considered the matter.

Runnymede Borough Council was once again invited on 28 October 2016 to send the Council any informal representations they may have and for them to be taken into account before the proposal was formally published for consultation. They were also offered an opportunity to meet to discuss the details of the proposal and the nature of the consultation. The Council met them to do so. The consultation started on 6 January 2017 for a period of six weeks, and they were formally consulted. The Council is satisfied that it has gone beyond the requirements of the duty to cooperate to reach out to the neighbouring authorities and to listen to any concerns they may have, and it is not correct to suggest that Runnymede was not adequately consulted. The Council understands that the duty to cooperate is a continuous process and has subsequently been engaging with Runnymede and Surrey Heath Borough Councils after the consultation period to establish a framework for joint working in the future. The above clearly demonstrates that the Council has positively engaged with Runnymede regarding this particular issue.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development. Each policy in the NPPF including the Green Belt policies such as paragraph 80 are therefore servant to the overall goal of achieving sustainable development. Sustainable development is the overall goal of the Core Strategy and decisions about its delivery must also be seen in that context. The Government's definition of sustainable development in the context of the planning system is 'the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18 – 219 of the NPPF. Planning judgments must therefore be holistic and should seek to balance the Green Belt policies with all other policies with sustainable development as the ultimate goal. Regarding the spatial distribution of development across the borough and the Site Allocations DPD in particular, meeting this goal in addition to the purposes of the Green Belt would include other evidence and factors such as the sustainability appraisal, proximity of sites to key services and facilities to minimise the need to travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect and feasibility for mitigating development impacts. It is also about creating sustainable places that links homes to jobs and key facilities and services by sustainable modes of travel. The decision of the Council for the purposes of the Regulation

19 consultation will rest on balancing all the above factors, using the available evidence. In accordance with paragraph 182 of the NPPF, the Council will only submit a Site Allocations DPD for Examination that it considers sound to avoid the risk of it being found unsound, acknowledging that the judgment on soundness is in the gift of the Independent Inspector of the Secretary of State.

**Contributor Reference:** 02342/1/001  
**Customer Name:** New Zealand Golf Club

**Summary of representation:**

New Zealand Golf Club Ltd is the owner of the majority of the identified land east of Martyrs Lane and is totally opposed to the Council's suggestion to safeguard the land as a potential future development site in the Council's Site Allocations DPD.

The land is not available for the proposed safeguarding. The club is a private members golf club that is more than 120 years old, with each full member owning voting shares. It is not a commercial concern. The club has an illustrious history and one of the most highly regarded heathland courses in Europe. The course was originally laid out in 1895 by Samuel Fergusson and one of the very few created and remodelled by Tom Simpson. It is one of his designs that has changed very little over the years.

There is no reasoned justification from the Council for the current consultation which is promoting a site that is not available and is not supported by the Council's own evidence base. The site is being promoted despite the unequivocal advice from the Head of Planning which confirmed that the site is not an appropriate location for residential development. The Council has gone against its own evidence by proposing the land as alternative for safeguarding.

The LDF Working Group has arbitrarily identified the land to the east of Martyrs Lane as an alternative to the previously identified safeguarded sites. No adequate reasoned explanation has been provided as to how the alternative site was identified and why other sites were not considered.

The proximity of the site to the Thames Basin Heaths SPA and the potential ecological implications has not been adequately assessed. A strategic impact assessment should be undertaken prior to the sites safeguarding and it is inappropriate to assume that the impact of development can be addressed through mitigation at the planning application stage.

The golf course has been managed for more than 120 years to maintain and enhance its biodiversity and ecological interest to provide a top quality backdrop to the playing of golf. The setting of the course, as one of the best-preserved Surrey heathland courses, is of considerable historical interest, as is the fact that the course is a signature project of the renowned course architect Tom Simpson. This cannot be replicated elsewhere. The development of the site will lead to a significant loss of biodiversity.

The land to the east of Martyrs Lane fulfils an important Green Belt function in terms of preventing urban sprawl, coalescence and encroachment into the countryside, as well as providing opportunity for outdoor sport. The Green Belt designation has also ensured the reuse of previously developed 'brownfield' urban land elsewhere at higher density in line with government guidance.

The Site Allocations DPD would be found unsound as it would be inconsistent with national policy, it would not be justified, it would not be effective and would not have been positively prepared.

The allocation of the site to the east of Martyrs Lane should not be considered as a safeguarded option for the period 2027 – 2040 and rather, the six sites that were previously included in the Regulation 18 Site Allocations Development Plan Document published for consultation in June–July 2015, all of which satisfy the relevant test of soundness, should continue to be safeguarded to satisfy the potential long-term development needs of the Council.

The Club's attention has been drawn to the potential of an amended proposal by the Council. In the event that alternative proposals are brought forward for partial substitution of part of the land to the east of Martyrs Lane for some or all of the safeguarded sites identified in the Draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), NZGC entirely reserves its position. If such a major change were to be proposed this would have to be fully explained with a detailed justification of which parts of the land to the east of Martyrs Lane is being proposed for safeguarding and which of the previously allocated sites are proposed to be substituted and the relative merits of each. If such a major change is to be proposed further consultation will be required.

The Council made no attempt to consult the New Zealand Golf Club prior to the formal consultation. The consultation would effectively be an informal exercise to gauge public reaction to the proposal. The concerns of the Club are shared by the local community and other organisations and landowners such as the newly formed Horsell and Woodham Neighbourhood Forum, Horsell Common Preservation Society and many of the landowners whose land were previously safeguarded in the draft Site Allocations DPD.

The proposal would be contrary to the provisions of national planning policy as set out in the NPPF for a number of reasons. It would lead to loss of biodiversity and sporting facilities, there is a strong local objection, it is not backed by evidence, a significant part of the land is not available and as such is not deliverable, development will lead to urban sprawl, proximity to the SPA has been ignored and there is risk of flooding.

Need for housing beyond 2027 has not been objectively assessed or appropriately justified. Based on the capacity of the safeguarded sites only 92 dwellings per year can be achieved between 2027 and 2040. This would suggest that the Council will be developing the site for up to 2,900 dwellings. No exceptional circumstances case has been established to identify land at the location.

The representation provides a chronology of the Site Allocations DPD process to date. These are set out in paragraphs 5.1 – 5.42, and the issues raised are all broadly summarised above.

The Club has provided letters written to the Council as supporting information to their representation. In summary the letters emphasises the fact that the land will not be available

for future development. It also expresses the Club's dissatisfaction of the manner the Council proposed the land as an alternative for safeguarding, and in particular, the role of Councillor Bowes who had previously made representation in July 2015 as a Ward Councillor. It is inappropriate for Councillor Bowes to chair the Working Group, which requires an independent and objective approach rather than the partisan perspective of a Ward Councillor. It would be inappropriate for Councillor Bowes to chair the Working Group when it considers representations as a result of the consultation. The LDF Working Group and the Council failed to provide clear and convincing reasons why the Officer's recommendations should not be accepted. The reasons given by the LDF Working Group were hopeless inadequate. The Council failed to gather the information needed to make informed and reasoned decision prior to taking it.

**Officer Response:**

The Council acknowledges that the New Zealand Golf Club is a significant landowner within the land east of Martyrs Lane and is aware of its confirmation that the land in its ownership will not be made available for the future development proposals of the Council. The availability of the land is a material consideration for the future deliverability of the land as highlighted by footnote 11 of the NPPF. It is proposed that if safeguarded, the land will be required for development between 2027 and 2040 and the NPPF highlights that to be deliverable, there should be the prospect that the housing will be delivered on the site within five years. In this particular context, the New Zealand Golf Club's representation demonstrates that there is no prospect of the land ever being made available now or in the future between 2027 and 2040. For information, McLaren has also made representations to clarify that they do not object in principle to the safeguarding of the land to meet future development needs but only on condition that the part of the land in their ownership is allocated as a strategic employment site to meet the specific business needs of McLaren. Without both parcels of land, Officers accept that it would be unlikely that 1,200 new dwellings could be achieved on the land. This is a matter that the Council has to take into account when deciding its preferred approach to safeguarding.

The ultimate goal that should drive the Council's overall decisions about the preferred approach to safeguarding should be the need to achieve sustainable development and the robust evidence to justify its decisions. In this regard, if the Council decides on the available evidence that the land east of Martyrs Lane is the most sustainable to meet the future development needs of the borough, the lack of availability of parts of the land should not be an absolute constraint to the development of the entire land. The Council has Compulsory Purchase Powers that it could choose to use to acquire land for common good, and the appropriate legal advice will be sought in this regard if necessary. The historic significance of the Golf Course is noted, and will be one of the factors that has to weigh in the balance when the Council makes its decision on the matter.

It is important to clarify that the Council has not yet made any choice to safeguard the land east of Martyrs Lane. It has only rightly consulted on the possibility of substituting the land east of Martyrs Lane for the six sites that were originally published as part of the Regulation 18

consultation of the Site Allocations DPD before it decides on the more sustainable of the two options. The Council has said that it will make the choice about the preferred approach to safeguarding after careful consideration of the representations received during the Martyrs Lane consultation. Whilst availability of land is a material consideration for the deliverability of any proposal, on its own, it should not be the only overriding consideration to outweigh all other benefits, including the evidence that from the public consultation exercise and other sustainability factors. The consultation was therefore justified on the basis of the evidence it could provide to inform key decisions of the Council. Paragraph 182 of the NPPF deals with the examination of Local Plans. It stresses that to be found sound, a Local Plan amongst other things must be justified. The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. In this context, it would have been irresponsible of the Council if it did not at least consider the land east of Martyrs Lane as a reasonable alternative in the light of the changing circumstances regarding the part of the land in the ownership of McLaren which occurred after the Regulation 18 consultation, the need to assess the land in a comprehensive manner and the apparent need to ensure a defensible Green Belt boundary after the release of Green Belt land. The delivery of the Core Strategy will impact on all aspects of life of people who live and work in the borough. In this regard, Members and Officers of the Council has a duty to familiarise themselves with all the necessary information that might be relevant to inform its decisions about the Site Allocations DPD, which is one of the key means for delivering the Core Strategy.

The Council has been transparent by publishing the Officers advice on the safeguarding of the land east of Martyrs Lane. Both Officers and Members agree as a matter of fact that the consultation was necessary and the representations that are received during the consultation are a source of relevant information to inform the subsequent stages of the Site Allocations DPD process. Whilst it is clear that the LDF Working Group did not accept the entire recommendations of the Officers report, it is clear from the minutes of the meeting that they carefully considered the report before reaching their recommendations. That is an appropriate procedure to follow. It is not correct for the representation to suggest that the Council has rejected the Officers recommendations because the Council has not yet made any decision on the Officers report or the recommendations of the Working Group. It has rightly reserved its right to do so after careful consideration of the representations received during the Martyrs Lane consultation. The request for the further consultation was appropriate and justified to aid informed decision making. The Working Group is set up to scrutinise Officers reports and make recommendations to the Council or other relevant decision making committees of the Council. The task and the action that the Working Group took regarding its recommendations on Martyrs Lane are therefore in line with its responsibilities. The Working Group provided justification for its recommendations, and these were put before the Council for consideration. The Council as a decision making body is yet to make its decision before consulting on the Publication version of the Site Allocations DPD. Councillor Bowes made representations in his role as a Ward Member on the Regulation 18 consultation. He had been transparent about that, and the Council has also been transparent in publishing that information as part of the response to the Regulation 18 consultation. There is nothing improper about his membership of the Working and or as Chair of the Group. The Council has a procedure for selecting

councillors to serve on Working Group, and he is on the Group through that proper process. It is therefore not intended to remove him from the Group on the basis of this representation.

The Council has already carried out a sustainability appraisal to assess reasonable alternative sites. This study is already published on the Council's website. The land east of Martyrs Lane is an additional site that has been assessed based on the reasons given above. Beyond that, no other sites had been assessed.

The Council has carried out a Habitats Regulations Assessment Screening for the potential safeguarding of the land east of Martyrs Lane. The report sets out the actions to take before the land can be fully screened out. The report to the study can be accessed by this link: <http://www.woking2027.info/allocations/hradec16.pdf>. It is not envisaged that the potential development of the site would undermine the overall integrity of the SPA if the necessary avoidance/mitigation measures are put in place.

The Council accepts and has always acknowledged that the SPA should be accorded the uppermost environmental protection under the European Union Directive. The importance of the SPA is acknowledged within the hierarchy of environmental designations set out in Policy CS7: Biodiversity and nature conservation of the Core Strategy. Policy CS8: Thames Basin Heaths Special Protection Areas of the Core Strategy is a specifically crafted policy to avoid harm to the SPA as a result of development. The policy mirrors and is in general conformity with the requirements of Policy NRM6 of the South East Plan. The policy takes a precautionary approach to the protection and conservation of the SPA and development will only be permitted where the Council is satisfied that this will not give rise to a significant adverse effects upon the integrity of the SPA and biodiversity in general. The provisions of the policy will apply. It is therefore not anticipated that the development of the site would lead to a significant loss of biodiversity. It is highlighted that Natural England has responded to the consultation and has no objection in principle subject to agreeing the necessary measures of avoidance/mitigation.

The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided appropriate contributions are made towards the provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the site.

It is acknowledged that the proximity of development to the SPA is an issue that needs to be taken into account in seeking to avoid harm to the SPA. The Council is aware of surveys carried out about the locational relationship between development and the SPA. However, that is not and should not be an absolute constraint to development. In fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will work in partnership with Natural England to agree appropriate measures of mitigation for any potential development on the site.

Paragraph 80 of the NPPF defines the five purposes of the Green Belt. Of particular relevance to this representation are:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

The Council has carried out the following two studies that assessed the site against the above purposes of the Green Belt.

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the studies, the Council would agree with the representation that the development of the land east of Martyrs Lane would lead to a degree of urban sprawl and a potential perception of towns merging. This is a matter the Council will have to weigh in the balance in its decision about the preferred approach to safeguarding. It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development. Each policy in the NPPF including the Green Belt policies such as paragraph 80 are therefore servant to the overall goal of achieving sustainable development. Sustainable development is the overall goal of the Core Strategy and decisions about its delivery must also be seen in that context. The Government's definition of sustainable development in the context of the planning system is 'the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18 – 219 of the NPPF. Planning judgments must therefore be holistic and should seek to balance the Green Belt policies with all other policies with sustainable development as the ultimate goal. Regarding the spatial distribution of development across the borough and the Site Allocations DPD in particular, meeting this goal in addition to the purposes of the Green Belt would include other evidence and factors such as the sustainability appraisal, proximity of sites to key services and facilities to minimise the need to travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect and feasibility for mitigating development impacts. It is also about creating sustainable places that links homes to jobs and key facilities and services by sustainable modes of travel. The decision of the Council for the purposes of the Regulation 19 consultation will rest on balancing all the above factors, using the available evidence. In accordance with paragraph 182 of the NPPF, the Council will only submit a Site Allocations DPD for Examination that it considers sound to avoid the risk of it being found unsound,

acknowledging that the judgment on soundness is in the gift of the Independent Inspector of the Secretary of State.

The representation does not indicate the source of the information about the current willingness of the Council to amend the proposal. It goes without saying that the Council would not make such a decision without careful consideration of all the representations received during the consultation. Officers have not reported to Council with the analysis of the representations and as such there is no basis for this information. Having said that, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council will publish the Publication version of the Site Allocations DPD to give the general public the opportunity to comment on it before the Site Allocations DPD is submitted to the Secretary of State for Examination.

The LDF Working Group considered the Officers report on the analysis of the Regulation 18 consultation at its meeting in September 2016. It made its recommendations for the Council to consider at its meeting on 20 October 2017. The Council could not have consulted on what was merely a recommendation of the Working Group until it had considered the recommendations and made a decision. It was unfortunate that the New Zealand Golf Club could not be consulted earlier than it had wished. Nevertheless, the Council did its best to consult the Club as soon as it was reasonable to do so after the Council had made the decision to consult on the recommendations of the Working Group. In this context, there was nothing deliberate or improper for not consulting the Club sooner. The Council has received representations from the local community, Horsell Common Preservation Society and the Horsell and Woodham Neighbourhood Forum. These are dealt with separately and it is not intended to repeat them in this response.

The representation has misunderstood the assumptions used to estimate future housing supply between 2027 and 2040. The assumptions are credible, acknowledging that an exact housing requirement could only be determined as part of the review of the Core Strategy and an up to date evidence at the time. The 2027 – 2040 housing provision of 1,200 dwellings is on the basis that the Council will continue to provide 292 dwellings per year. For the 13 year period, this is estimated to be 3,796 dwellings. It is assumed that lower density development in the Green Belt of about 30dph will continue into the future. An intelligent assumption has been made that the urban area will continue to make a significant contribution towards housing supply during that period in line with the overall spatial strategy. The projection is that the urban area will provide about 50% of the total supply of housing during that period. A marginal allowance has been made for windfall development, which will continue to come forward during that time. Historical estimates over 10 years suggest that about 40 dwellings per year will be delivered through this source. On the basis of the above the figure of 1,200 specific in the consultation document is a reasonable and realistic expectation of what would be accommodated on the safeguarded site(s). The estimated housing requirement of 92 dwellings quoted in the representation is therefore wrong and without any proper basis.

The chronology of the Site Allocations DPD process as set out in the representation is noted. In all, the Council is satisfied that the correct procedure is being followed recognising that some

of its decisions are not shared by the representations. Based on the Officer's response as a whole, it demonstrates that the preparation of the Site Allocations DPD so far has been in general conformity with the NPPF. Also, it has been demonstrated above that the actions of the LDF Working Group was appropriate. It was also appropriate for Councillor Bowes in his capacity as Ward Member to make representations to the Regulation 18 consultation and participate in discussions of the Working Group. The final decision of the Site Allocations DPD resides with the Council, and as emphasised, the Council is yet to make its decision for the purposes of the Regulation 19 consultation, and the outcome of the consultation will help inform that decision.

**Contributor Reference:** 02309/1/001  
**Customer Name:** Ms Carol Elizabeth Birk

**Summary of representation:**

The representation is unhappy about the loss of any Green Belt areas within the borough but would agree to the substitution of the land to the east of Martyrs Lane for the safeguarded sites identified in the Draft Site Allocations DPD (Byfleet, Mayford and Pyrford).

These three sites are pristine Green Belt which should not be considered for development as they have landscape and heritage value. Pyrford in particular is used for recreation by the rest of the Borough and by those from outside it as well. It is according to Woking's own policy "escarpment and rising ground of landscape importance" and your own Consultants said it should not be considered for development.

For a similar reason especially because of its nearness to Horsell Common, does not believe that the New Zealand Golf course should be considered for future development as this would cause a serious decline of natural habitat within the area and road access on to Woodham Lane would cause major traffic problems.

Considers the rest of the Martyrs lane site because the top part of the site has previously been designated for development and includes predeveloped land – the old army camp.

Some of the land is already in public ownership which hopefully allow for more affordable housing.

The site as a whole would allow for the 1300 houses the Borough needs in one consolidated area so that providing infrastructure and amenities would be much easier and cheaper and less disruptive than in the other six sites.

This site has better transport links than the other sites. The A320 allows access to both Woking and the M25 and to major employers such as St Peter's Hospital and Woking town centre.

The other sites in Byfleet and Pyrford which were proposed could not support the additional traffic which their development would cause. The Parvis Road is often gridlocked now and will become more so when Sheer House and the old MOD site are heavily developed in the near future.

**Officer Response:**

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

The representation regarding Landscape character and heritage and amenity value are also addressed in the "Regulation 18 Consultation Issues and Matters Topic Paper".

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If

any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on

the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to

manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site, including the Sheer House Development.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02310/1/001  
**Customer Name:** Mr Richard Davis

### **Summary of representation:**

The representation considers this is a difficult consultation as all of the seven sites under discussion are in Greenbelt but, on balance, supports substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course. The key reasons are the top part of the site was recently granted planning permission. There is currently no public access to the land. A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc. The northern part of the site is well served with public transport unlike the other six sites. The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre. The northern part of the site is close to major local employers like St Peter's Hospital and Animal & Plant Health Agency. Much of the northern site has already been used for non-agricultural purposes . Part of the northern site is publicly owned land so the sale would help council tax payers. Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites

### **Officer Response:**

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste

safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking

Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02332/1/001  
**Customer Name:** Mr Alan Stuart

**Summary of representation:**

The use of the proposed site to cover allocation of a significant number of houses 1200, is a sensible approach as the required infrastructure can be put in there to make this feasible. The earlier proposals of trying to add pockets of housing in small rural areas with insufficient roads and infrastructure is flawed. Creating a new housing hub with all that is required, makes sense.

The access and road communication to such a site is good for major routes and commutes.

It is understood that there are no other national or local landscape issues such as there were on previous proposed allocations GB10, GB11 and GB13. It is also understood that much of the proposed land is derelict and some of the area had previously been granted planning permission to McLaren.

The proposed site is nearly twice the size of the six sites it could replace. This will provide for all the properties necessary to fulfil Woking's future Housing and Traveller needs, even further requirements post 2040.

Support the proposal as it makes more sense and is more practical than the previous proposed allocations. Opposed to the other proposed sites.

**Officer Response:**

Support for the Martyrs Lane site and opposed to the other allocated sites is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using

its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of

Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

**Contributor Reference:** 02322/1/001  
**Customer Name:** Ms Elizabeth Hewitt

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

The development to the north of Woking gives additional housing to the other sites. Development around Martyrs Lane gives an opportunity to redevelop the Sheerwater estate with less disruption to the current residents. The road out to the M25 is in need of improvement and widening to create a stronger corridor to the M25. Surrey County Council has not had a major road development since the Blackwater Valley development. Thus the Martyrs Lane site gives housing, social, economic and transport improvements.

**Officer Response:**

Support noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a

single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02340/1/001

**Customer Name:** T R Griffiths

**Summary of representation:**

The representation considers this to be a difficult consultation since all seven sites under discussion are in Greenbelt. However, supports the Martyrs Lane site to accommodate 1,024 dwellings in the draft Site Allocation DPD on a single site. Other reasons in support of the designated Martyr's Lane site are the top part of the site includes pre-developed land used as a wartime army camp; and now derelict; this area was also recently granted planning permission for a technology centre. A single site would offer economies of scale with regard to the infrastructure issues arising from the building of more homes. The northern part of the site is well served with public transport unlike the other six sites. The northern part of the site has access onto the A320 with road links to the M25 and Woking town centre. The inevitable disruption would be felt by fewer Woking residents by building on one site rather than six individual sites.

**Officer Response:**

Support noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a

single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02343/1/001  
**Customer Name:** Mr Mark Smedley

**Summary of representation:**

The representation main objection is traffic issues that the development will cause in the area. This new development will result in even more traffic on existing roads which are already extremely busy.

**Officer Response:**

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;

- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 02344/1/001  
**Customer Name:** Mr Richard Jones

**Summary of representation:**

Strong objection to the possibility of building upon the Pyrford Fields site as a part substitution for building on land east of Martyrs Lane or other sites. The extra housing, and the significantly increased population would overwhelm the existing limited Pyrford village infrastructure.

The road layout is currently only just sufficient for its existing needs – the current Church Hill / Upshot Lane / Pyrford Common Road intersection is already congested and any increase could lead to dangerous road conditions and increased noise.

Parking is already a significant problem around Pyrford Primary School and this is likely to become worse upon completion of the school's current rebuilding. Increased traffic and parking in the local area then effects road efficiency and pedestrian/child safety.

The Infrastructure (limited shops, lack of medical / chemist facilities, poor adaptation for the elderly and disabled) of Pyrford is already inadequate with the current population. Any further increase in population would simply exacerbate an already poor situation.

**Officer Response:**

Objection to building on Pyrford fields is noted.

The Regulation 18 consultation Issues and Matters Topic Paper addresses some of the issues raised in detail, including potential impacts of development on traffic (Section 3, 20, and U); ensuring sufficient infrastructure provision (Section 3); and population growth (Section 23).

The Council is aware of on-street parking issues within the local area, and has recently published its updated Parking Standards SPD which ensures that future development does not adversely impact on highway safety. In addition, at Development Management stage of any planning application, a Transport Assessment would need to demonstrate that any adverse impacts can be sufficiently avoided or mitigated in order to be approved.

**Contributor Reference:** 02345/1/001  
**Customer Name:** Ms Marian Jones

**Summary of representation:**

Supports Martyrs Lane as a single site at Martyrs Lane will provide greater economy of scale to address the many infrastructure issues concerning the original six sites and additional community services .It should be possible to build a new Health centre, First School and affordable housing.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the

Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02347/1/001  
**Customer Name:** Dr And Mrs A R J And M Wall

**Summary of representation:**

The Martyrs Lane site would be far more appropriate for the new housing development rather than in particular GB10 & GB11. The main reason is the traffic problems to Hook Hill Lane that the new developments would cause. The mornings and evening rush hour on Hook Hill Lane is congested coming over the narrow bridge from Mayford and the A320.

Often there is excessive traffic outside our house and cars travelling at speeds in excess of that which is safe for such a small lane. In the Winter, because of the snow and ice, there are many accidents on the lane. An increase in traffic will occur once the Egley Road development is finished. There has been no specific infrastructure to ameliorate the increase in traffic. Indeed Hook Hill Lane is so narrow that it could not be widened. Traffic also queues regularly over the railway bridge by Saunders Lane making the problem worse.

Strongly considers that it is dangerous for the Council to consider building more houses especially in GB10 that will cause major road problems around Hook Hill Lane. As there is another site in Martyrs Lane that would be more suitable from a traffic infrastructure point of view, choose that site rather than GB10 and GB11.

**Officer Response:**

Support for Martyrs Lane and objection to building on GB10 and GB11 are noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Regulation 18 consultation Issues and Matters Topic Paper addresses some of the issues raised in detail, including potential impacts on traffic around Hook Hill Lane (see Sections 3, 20 and U). It also sets out the justification for the release of Green Belt land at Sections 1 and 2.

**Contributor Reference:** 02346/1/001

**Customer Name:** Mr Mike Legg

### **Summary of representation:**

1 LSE A 21st Century Metropolitan Green Belt – LSE A 21st Century Metropolitan Green Belt has done research on what types of land is most important to protect from development. This highlights over 70% of people value land with endangered wildlife, 54% value scenic land, only 40% value quality farmland and 17% value small parcels of land near other developments. This research proves that Woking Borough Council's original site allocations are far more suitable than the proposal to replace these several sites with the land east of Martyrs Lane. The report also suggests that the duty to cooperate will not produce a strategic response to the region's housing needs. The plans to develop Fair Oaks Airport and other developments in Surrey Heath and Runnymede boroughs have direct impact on Woking Borough Council's decision and further indicate that the land east of Martyrs Lane is not suitable.

2 SANGs – The current proposal includes sufficient SANGs capacity for the six sites. Horsell Common Preservation Society has indicated that more SANGs would be required given the size and close proximity of the land east of Martyrs Lane to SSSI. Natural England has clarified the purpose of SANGs and the requirements for their accessibility. Woodland or semi-wooded landscape is a key feature that people appreciate in the sites they visit, particularly those who use the SPA. This is considered to be more attractive than open landscapes or parklands with scattered trees. It is therefore hard to justify how the current proposed areas of SANGs would meet the specified standards set by Natural England. Given comments made by Rural England that visitors favour Woodland or a semi-wooded landscape, why would residents of land east of Martyrs Lane want to go to these SANGs over the SPA.

3 2016 Air Quality Annual Status Report (ASR) – According to the Air Quality Report published by the Council, there is only one area in Knaphill that has been declared an Air Quality Management Area. However the A320 is an area of concern, and monitoring stations have been used near the site at Woodham Lane, Lincoln drive and Church. Woodham Lane already has by far higher levels of NO<sub>2</sub>. The Council has a responsibility to measure and improve air quality and any development needs to be sensitive to air quality. New houses and more cars in an already high air pollution area would increase levels of NO<sub>2</sub> whereas spreading the development over 6 sites would be far less damaging.

4 Transport hotspots – The proposals in the draft Site Allocations DPD does not present significant transport issues. However, Six Cross Roads, Martyrs Lane and Woodham Lane are all shown as major concerns if Martyrs Lane is to be developed. Police data also shows that Woodham Lane is an accident blackspot. None of the six sites will generate traffic concerns and none are accident blackspots. Only the area outside the Pyrford Primary School is highlighted as potential hotspot.

5 Schools – There is no local primary school within walking distance that kids could go to. The closest would be the Marist Catholic School which is already at capacity with no room to expand.

6 Natural Woking Strategy March 2016 – The Council has failed to comply with the requirements of its own Natural Woking Strategy. The Strategy states that the Council will:

o promote high quality environment, biodiversity and sustainable development. It will take measures to protect priority wildlife species population, by reducing habitat fragmentation.

The proposal contradicts the above. It would lead to the loss of woodland and would devastate habitat for many species. The other sites are all less diverse than the land east of Martyrs Lane.

7 Safeguarded plans – The land contains sites that are safeguarded for waste and mineral extraction that would be lost by the proposal. If they are not developed, there will be less development on the site than anticipated, and this would lead to more of the New Zealand Golf Course being developed. The NPPF seeks to protect minerals safeguarded sites.

8 Other development sites – There are other sites that have not been considered which they should. This includes Traditions in Pyrford and Sutton Green, where the current owners are struggling to make money and have approached the Council before about possible development.

9 The Government White Paper on housing – The Housing White Paper has made it clear that local authorities should amend Green Belt boundary only when they can demonstrate that they have examined fully all other reasonable options for meeting development requirements and where land is removed from the Green Belt, local authorities should require the impacts to be offset by compensatory improvements to the environmental quality or accessibility of the remaining Green Belt land. This suggests that the Council would need to do further evidence before removing any land from the Green Belt. So far the Council has not published any evidence of the actual needs of housing from 2027 – 2040. Given the requirements of the White Paper, the Council should stop the preparation of the Site Allocations DPD process to safeguard land for 2027 – 2040 until such time that it can clearly demonstrate a requirement.

10 Peter Brett Associates report – Residents and other Wards are quoting the Peter Brett's report as the reason why Martyrs Lane should be considered. However, the report concludes and recommends that Parcel 2 – the land east of Martyrs Lane is not recommended to be released from the Green Belt.

11 Notes of Council meetings – There have been several meetings about the proposal that highlights a lack of evidence used by councillors to justify the safeguarding of the land east of Martyrs Lane. At no point did the Council give any consideration to the cost involved in this exercise. The LDF Working Group went against the available evidence and the advice of Officers. Given that Councillor Bowes represents the Ward of Pyrford, his actions at the Working Group could be seen as Nimbyism because he presented no credible evidence to justify his proposal to include the land east of Martyrs Lane as alternative safeguarded site. The Working Group should not have been allowed to make its recommendations without evidence. The Working Group should be held accountable for all the cost they have incurred for embarking on this exercise when they have no evidence to do so. The Working Group has misled the Council.

12 Sustainability Appraisal – The representation accepts that the sustainability appraisal is comprehensive but disagrees with some of the scoring in the report. Full details are in the representation but have been taken into account in the Officer's response.

13 Other factors – Some people have claimed that only Parcel A, the northern part of the land is required to build the required number of houses. However, the Hankinson Duckett study has concluded otherwise. Taking into account the flood risk areas, the remaining area can only be developed at a density of 68.7 dph to achieve the required number of dwellings proposed for the site.

14 Runnymede Borough Council objections – The representations by Runnymede Borough Council shows the lack of cooperation between Runnymede Borough Council and Woking Borough Council. The Council needs to cooperate with its neighbouring authorities and have a duty to care for each other and respect each others' views.

**Officer Response:**

1 The Council has not carried out a similar research quoted in the representation to assess the opinions of people about the value they attach to different types of land and therefore cannot endorse or disprove it. Regardless of this, the research does not prove that any of the options considered is better than the other. There is also no evidence to claim that any of the sites is habitat to endangered species. There are no absolute environmental constraints on any of the sites that would prevent their development if the Council decides on its preferred approach to safeguarding. The Council has robust policies in place to make sure that the ecological integrity on any site is not compromised as a result of development. This will be key requirement for the allocation of the site. It is important to emphasise that the Council's decision on the preferred approach to safeguarding will not rest only on the opinion of how different types of land are valued by people. The overall goal of the Council is to identify sites in sustainable locations that would contribute towards achieving sustainable development, and this should be done within the context of the overall spatial strategy for the Borough. Whilst the ecological integrity of the land will always be a material consideration, there are other factors too such as the proximity of the site to key services and facilities, availability and deliverability, risk of flooding, ability to be supported by the necessary infrastructure and many more that needs to be taken into account. The duty to cooperate is a legal duty and the Council has been cooperating with the neighbouring authorities in the preparation of the plan. The Council is satisfied that so far the requirements of the duty to cooperate are being met.

2 The Council has identified sufficient SANG capacity to meet the development needs of the Core Strategy. Horsell Common Preservation Society has made representations as a result of the consultation regarding the provision of SANGs to serve development at Martyrs Lane, and these are addressed separately. In summary, Officers believe that some of the concerns expressed by Horsell Common Preservation Society are misplaced. The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy and the CIL Charging Schedule. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided appropriate contributions are made towards the

provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the land east of Martyrs Lane or the other six sites. Officers are confident that the above requirements will be met if the Council decides to safeguard the land for future development.

It is acknowledged that the proximity of development to the SPA is an issue that needs to be taken into account in seeking to avoid harm to the SPA. However, that is not and should not be an absolute constraint to development. In fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will work in partnership with Natural England to agree appropriate measures of mitigation for any potential proposal.

Natural England has submitted representations in response to the consultation. It does not have any objection in principle to the safeguarding of the site subject to the appropriate scale of SANG being provided. Natural England notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. There are a number of examples to draw lessons. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed. The draft Site Allocations DPD proposes to allocate a number of sites for SANGs. Natural England has been consulted and they have not raised any objection in principle. The proposed SANGs would be the requirements for SANG designation. The Council does not accept that the SANG proposals in the draft Site Allocations DPD will not meet development needs and/or achieve their intended objectives.

3 There is no declared air quality management area in the vicinity of the Martyrs Lane site. The Council has robust policies to manage air quality impacts as a result of development. In particular, Policy DM6: Air and water quality of the Development Management Policies DPD sets out strict air quality standards for development to meet. There are other policies such as policies DM5, DM7 and DM8 of the development Management Policies DPD that would apply to manage other sources of pollution as a result of development. Officers are satisfied that if the site is to be safeguarded it can be delivered without unacceptable risk to air quality.

4 The Council is fully aware of local concerns about the existing traffic conditions on various transport routes including the Woodham Lane and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generate by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate measures of mitigation to address the adverse impacts of proposed development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);

- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including potential development at Martyrs Lane.

It is too simplistic to assume that the development of the six sites will not raise significant transport issues. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios. It is important to stress that in this particular case the comparison would be between the development impacts of Martyrs Lane against the cumulative impacts of the six sites.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

A245 Woodham Lane/Sheerwater/Parvis Road;  
A320 Chertsey Road/Guildford Road; and  
B382 Old Woking Road.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. The Council is also working in partnership with Surrey Heath and Runnymede Borough Councils and the County Council to quantify the cumulative transport impacts of developments in the three authorities, including developments at Longcross and Fair Oaks if the Martyrs Lane site is safeguarded. The outcome of the study will also help determine the strategic mitigation measures that might be needed to address the cumulative

impacts. The Council accepts that the safeguarding proposals would lead to increase in traffic as demonstrated by its own studies, and mitigation will be needed to address that. It is working with the relevant bodies to determine the appropriate mitigation measures to enable the sustainable delivery of the proposals.

5 The Council will make sure that the development of any safeguarded site is supported by the necessary infrastructure including education provision. The County Council has made representation to confirm that if the Martyrs Lane site is to be developed in the future, the expectation would be that a primary school should be provided on site. If the need is proven, it will be a key requirement for the development to provide a primary school on site. In this regard, the concern raised will fully addressed.

6 It is not envisaged that the development of the site if it is safeguarded would be contrary to the provisions of the Natural Woking Strategy. The site can be developed without compromising the nearby Thames Basin Heaths Special Protection Area. Its safeguarding would not be contrary to Policies NRM6 of the South East Plan and CS8: Thames Basin Heath Special Protection Areas of the Core Strategy if sufficient SANG capacity could be identified to support the development and a contribution is made towards Strategic Access Management and Monitoring. Any mitigation will also take into account the proximity of the site to the designated SPA. The Council can demonstrate that sufficient land will be available to support the development. The Core Strategy has robust policies to make sure that harm to the SPA as a result of development is avoided, and this will apply to any future proposal for development. Policy CS7: Biodiversity and nature conservation is sufficiently robust to protect the ecological integrity of the site. Based on the above, the Council is satisfied that the site could be developed to be in conformity with the Natural Woking Strategy. This representation has also been comprehensively addressed in the Council's response to the Woodham and Horsell Neighbourhood Forum's representations (see Woodham and Horsell Neighbourhood Forum – Issues and Matters Topic Paper).

7 The Council recognises the contribution that the community recycling centre makes towards its objective to maximise recycling in the borough. Its retention on the land as part of the master planning of the site or the provision of a new facility at an enhanced location will be made a key requirement of the allocation of the site if it is allocated. The County Council who owes the facility is supportive of this approach, and will work with the Council to agree the most effective way of retaining the facility. The owner of the land safeguarded for minerals extraction has submitted a representation as part of the Martyrs Lane consultation, and has indicated support for the site to be safeguarded to meet future housing needs of the Council. In this regard, the land could be available for future housing needs subject to further discussion with the County Council on whether or not the site will continue to be needed for their future purposes. At this stage the County Council is unsure about the future need of the site for their purposes until further assessment is undertaken as part of the emerging Surrey Waste Local Plan. Officers will continue to liaise with the County Council on this matter, and are confident that a consensus would be reached.

8 Traditions in Pyrford and Sutton Green Golf Course have not been assessed as part of this process. The land east of Martyrs Lane has been assessed because parts of it had already been assessed as part of the Regulation 18 consultation. Given the changing circumstances at the McLaren site regarding the extant planning permission that could be revoked, there is justification to assess the prospect of a comprehensive development of the entire area.

9 It is important to highlighting that the Housing White Paper does not seek to change the direction of national policy as set out in the NPPF, and neither is it an in-principle new policy. It is only intended to clarify what the existing Green Belt policies mean in practice. Woking Borough Council had always understood the interpretation of the national policy on Green Belt and is already practicing what the White Paper is proposing and as such there will be no need to carry out any further work as suggested by the representation and no purpose will be served by stopping the Site Allocations DPD process. The White Paper itself goes at length to explain that there is no change in policy regarding Green Belt. The White Paper also has suggested compensatory improvements to the environmental quality or accessibility of the remaining Green Belt when Green Belt land is released. The Council has sought further clarification on what this would be in practice in its response to the consultation on the White Paper. Even that, the Council can demonstrate that it can and is meeting this particular requirement.

The NPPF and the White Paper both offers the same strict protection to the Green Belt. The principle that once established the Green Belt boundaries should only be altered in exceptional circumstances through the review of the Local Plan has not changed. The Council has rigorously applied this principle to underpin the preparation of the Core Strategy and the Site Allocations DPD.

A key factor that has mainly been taken into account to justify exceptional circumstances for releasing Green Belt land through the plan making process has been to demonstrate that alternative options have been fully considered, including a thorough assessment of the capacity of the urban area to accommodate projected development needs. The Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review are evidence to demonstrate the assessment of brownfield sites. Paragraph 159 of the NPPF requires Local Planning Authorities to prepare as evidence 'a strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'. Generally and specifically in Woking, SHLAAs has mainly focused on urban sites, predominantly previously developed land and how their uses can be maximised.

The Core Strategy takes this principle fully on board. In particular, Policy CS1: A spatial strategy for Woking Borough of the Core Strategy and its reasoned justification seeks to maximise the use of brownfield land. The high indicative densities set out in Policy CS10: Housing provision and distribution of the Core Strategy also reflects this principle. There are therefore clear and strong policy framework to prioritise and support development on previously developed land at high densities subject to character and environmental considerations.

Planning decisions relating to development proposals in Woking Town Centre also rigorously applies this principle. The Victoria Square and Goldsworth Road approved proposals are good examples. The Victoria Square proposal is about 660dph. The proposed indicative densities for the proposals in the draft Site Allocations DPD also seeks to maximise the efficient use of urban land. The Sheerwater scheme is a classic example of how the Council is using urban regeneration to improve living and environmental conditions of the area as suggested in the White Paper. On the basis of this, the Council has done more than the White Paper requires, and does not need to do any further work in response to the White Paper.

The NPPF is clear about the need and the reasons for safeguarding sites to ensure the enduring permanence of the Green Belt boundary beyond the plan period. It would be unreasonable within this policy context to accurately predict the exact future housing requirement. Right, the projections are based on a thorough assessment of historical data and intelligent assumptions of future provision of housing. The assumptions are credible, acknowledging that an exact housing requirement could only be determined as part of the review of the Core Strategy, an up to date evidence at the time and appropriate scrutiny at an examination. The 2027 – 2040 housing provision of 1,200 dwellings is on the basis that the Council will continue to provide 292 dwellings per year.

For the 13 year period, this is estimated to be 3,796 dwellings. It is assumed that lower density development in the Green Belt of about 30dph will continue into the future. An intelligent assumption has been made that the urban area will continue to make a significant contribution towards housing supply during that period in line with the overall spatial strategy. The estimated projection is that the urban area will provide about 50% of the total supply of housing during that period. A marginal allowance has been made for windfall development, which will continue to come forward during that time. Historical estimates over 10 years suggest that about 40 dwellings per year will be delivered through this source. On the basis of the above the figure of 1,200 specified in the consultation document for which land is sought is a reasonable and realistic expectation of what would be accommodated on the safeguarded site(s).

10 The Council is aware that the Peter Brett's report did not recommend that Parcel 2 be released from the Green Belt. This is a material consideration that the Council will take into account when considering the representations to the consultation.

11 The Council is transparent about the conduct of its meetings and has published the Officers' advice on the safeguarding of the land east of Martyrs Lane. Both Officers and Members agreed that the consultation on the land east of Martyrs Lane was necessary and the representations that are received during the consultation will be source of relevant information to inform the subsequent stages of the Site Allocations DPD process. Whilst it is clear that the LDF Working Group did not accept the entire recommendations of Officers, it is clear from the Minutes of the meetings that they carefully considered the report before reaching their recommendations. The Working Group also had all the necessary evidence before them to inform their recommendations. Appropriate procedure is followed in this regard. The Council has not yet made any decision on the Officers report or the recommendations of the Working Group. It has rightly reserved its right and authority to do so after careful consideration of the

representations received during the Martyrs Lane consultation. The request for further consultation was appropriate and justified to aid informed decision making. The Working Group is set up to scrutinise Officers reports and to make recommendations to the Council or other relevant decision making committees of the Council. The task and the action that the Working Group took regarding its recommendations on Martyrs Lane are therefore in line with its responsibilities. The Working Group provided reasons for their recommendations. Council as a decision making body is yet to make its decision before consulting on the Publication version of the Site Allocations DPD (Regulation 19). Councillor Bowes has also been transparent about his proposed amendment at the Working Group. There is nothing improper about his conduct in this regard. He provided clear reasons for his amendment and it will be up to the Council to judge whether or not the recommendations of the Working Group are rational. The fact Councillor Bowes is a Ward Councillor in a ward that Green Belt sites are proposed to be released should not be a reason to prevent him from participating in discussions about the Site Allocations DPD in an open and transparent manner, in particular, as the Working Group is only a scrutiny and an advisory group.

12 It is noted that the representation has come to different conclusions on some of the scorings in the sustainability appraisal. It is reasonable to expect that this could happen. The Council has used consistent and clear assumptions to inform the scoring and are satisfied of the scores.

13 The geographical extent of the land east of Martyrs Lane is defined by a Map and it includes the golf course. The Council had not specified which parts of the land will be used for what purpose. This is a decision that will broadly be informed by the representations to the consultation and in detail through a potential masterplanning of the land if it is safeguarded. The consultation document was also clear that the land should be capable of delivering at least 1,200 homes. This is necessary to justify it as an alternative to the six sites it seeks to replace. The Hankinson Duckett report has recommended that the development of Parcel A (north of the land) will lead to an isolated development in the Green Belt. The Council will take the information into account to inform its final decisions.

14 Runnymede Borough Council has made a separate representation regarding the duty to cooperate, which has been fully addressed.

Officers strongly disagree with their assertion that the Council has not met its requirements for the duty to cooperate by not consulting Runnymede and the neighbouring authorities prior to the consultation. The claim is factually incorrect. The Council resolved to consult on the possibility of substituting the land east of Martyrs Lane for the six original safeguarded sites at its meeting on 20 October 2016. Runnymede Borough Council and the other neighbouring authorities were notified of the Council's decision soon after that on 24 October 2016. The Council had not previously considered this matter. The proposal was referred to Council for consideration by the LDF Working Group and the 20 October 2016 meeting was the first time the Council had considered the matter.

Runnymede Borough Council was once again invited on 28 October 2016 to send the Council any informal representations they may have and for them to be taken into account before the

proposal was formally published for consultation. They were also offered an opportunity to meet to discuss the details of the proposal and the nature of the consultation. The Council met them to do so. The consultation started on 6 January 2017 for a period of six weeks, and they were formally consulted. The Council is satisfied that it has gone beyond the requirements of the duty to cooperate to reach out to the neighbouring authorities and to listen to any concerns they may have, and it is not correct to suggest that Runnymede was not adequately consulted. The Council understands that the duty to cooperate is a continuous process and has subsequently been engaging with Runnymede and Surrey Heath Borough Councils after the consultation period to establish a framework for joint working in the future. The above clearly demonstrates that the Council has positively engaged with Runnymede regarding this particular issue.

**Contributor Reference:** 02306/1/001  
**Customer Name:** Ms Pauline Newton

**Summary of representation:**

Objects strongly to the proposed development on the fields in Pyrford as its loss will impact current and future generations.

Pyrford has seen an increase in its housing over the years and this has put a great deal of pressure on such services as the local school, the Medical Centre in West Byfleet and local roads. To develop the Pyrford Fields would add greatly to all those pressures when there is no mention of improving them alongside the housing proposals.

Green Belt Land is a treasured possession and should be preserved including all the sites within the DPD, other alternatives should be looked at.

Supports the possible substitution of the Martyrs Lane site as a new community would develop and take on a character of its own with purpose built facilities like a new school, medical facilities, local shops etc., with the possibility of affordable housing.

The site, in part, has already been used for non-agricultural purposes, for wartime activities but now almost derelict and one part was granted planning permission for a technology centre so already considered for development.

To build on one site, a portion of which is already publicly owned, would help with the financial implications of providing services that would be concentrated on one site

This site, in part is already served by public transport and would have easy access to A320 that feeds Woking and the M25 when new roads are built.

This road network would in turn be useful to anyone employed or seeking employment at such places as St Peter's Hospital, The Animal and Plant Health Agency, Brooklands site and within Woking itself.

One complete new housing development, with a new infrastructure and amenities would cause far less disruption within the Borough and would save valuable Green Belt Land for all residents, now and in the future.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and

still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios,

including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst

this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site.

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Consultation Issues and Matters Topic Paper'. The issue of brown field sites, landscape, medical facilities and infrastructure have also been addressed in the 'the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

**Contributor Reference:** 02307/1/001  
**Customer Name:** Mr Malcolm Pritchard

### **Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040

The Martyrs Lane site is on Green Belt land, some of which has been previously developed – which is not true of the other proposed sites.

The A245 through West Byfleet & over the M25 bridge has virtually no capacity left, especially when other new development in the area is taken into account, in particular the Broadoaks development. The East side of Woking and routes to West Byfleet and Woking stations and Woking Town Centre will become gridlocked should the proposed development of Wisley Airfield proceed. On the contrary, the Martyrs Lane site provides direct access to a major trunk route, the A320, facilitating access to Woking Town Centre and the M25/Heathrow Airport. The A320 also provides bus and cycle routes and opportunities to encourage sustainable modes of transport.

one site for the future housing needs of Woking would probably mean "economies of scale" and would help to find solutions to many of the infrastructure concerns.

Amenity value, Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.

The Heritage features of the area which incorporates the two Pyrford fields includes the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a Site of Nature Conservation Interest, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area. These considerations do not apply to the Martyrs Lane site.

Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.

Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

The Martyrs Lane site provides proximity to major local Employers in particular, St Peter's and Runnymede hospitals, the Animal and Plant Health Agency and McLaren.

## Officer Response:

Support for the Martyrs Lane site is noted.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served

by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

If the Council were to decide to safeguard this site or the other six sites, its development will take into account any development proposals in the vicinity of the site.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The issue of landscape character and amenity have been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This site in Pырford is not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that this particular site is of low soil quality.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

**Contributor Reference:** 02308/1/001  
**Customer Name:** Ms Marjorie Pritchard

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040

The Martyrs Lane site is on Green Belt land, some of which has been previously developed – which is not true of the other proposed sites.

The A245 through West Byfleet & over the M25 bridge has virtually no capacity left, especially when other new development in the area is taken into account, in particular the Broadoaks development. The East side of Woking and routes to West Byfleet and Woking stations and Woking Town Centre will become gridlocked should the proposed development of Wisley Airfield proceed. On the contrary, the Martyrs Lane site provides direct access to a major trunk route, the A320, facilitating access to Woking Town Centre and the M25/Heathrow Airport. The A320 also provides bus and cycle routes and opportunities to encourage sustainable modes of transport.

one site for the future housing needs of Woking would probably mean "economies of scale" and would help to find solutions to many of the infrastructure concerns.

Amenity value, Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.

The Heritage features of the area which incorporates the two Pyrford fields includes the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a Site of Nature Conservation Interest, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area. These considerations do not apply to the Martyrs Lane site.

Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.

Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

The Martyrs Lane site provides proximity to major local Employers in particular, St Peter's and Runnymede hospitals, the Animal and Plant Health Agency and McLaren.

## Officer Response:

Support for the Martyrs Lane site is noted.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

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The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

If the Council were to decide to safeguard this site or the other six sites, its development will take into account any development proposals in the vicinity of the site.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The issue of landscape character and amenity have been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This site in Pyrford is not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that this particular site is of low soil quality.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

**Contributor Reference:** 02351/1/001  
**Customer Name:** Mrs Marie Stuart

**Summary of representation:**

This proposed site is situated in an area with good transport links and in the proximity of nearby major employers. The road serving the area is an established major route between Woking and the M25 and other major roads in the area.

The site is large enough to fulfil all the future housing needs and to allow for the measured and proportional development of the necessary infrastructure to support such a project. This is preferable to the piecemeal development of scattered areas which have limited infrastructures which struggle to cope with their existing populations. Roads with pinch points and single carriageways cannot cope with huge increases in traffic flow. Water provisions and sewage capacity, and provision of gas and electricity supplies would require extensive work to provide for the development far in excess of the current populations in the earlier proposed sites.

The Martyrs Lane site does not have Landscape designation and no Escarpment and Rising Ground Landscape Importance issues such as those faced in GB10, GB11 and GB13. Also part of the land on this proposed site has been previously earmarked for development.

In considering a large site such as this, it is possible to accommodate affordable housing requirements and targets for other groups including the elderly and specialist vulnerable groups. The proximity to a major hospital may also be of value in these latter groups.

With respect to travellers pitches, all the current sites are focused towards the south of Woking. The Martyrs Lane site would offer a choice of a different part of the borough in which to live with a sustainable purpose built infrastructure situated, as required, so as not to impact on the visual amenity and character of the area.

Support the proposals for the development of the Martyrs Lane site.

**Officer Response:**

Support for the development of the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course

and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

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- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

In terms of specialist residential accommodation, it is not known at this stage which type and nature of development will be allocated this depends on the site allocation DPD and Core Strategy.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

**Contributor Reference:** 02277/1/001  
**Customer Name:** Surrey Wildlife Trust

**Summary of representation:**

Please consider these representations as those of the Surrey Wildlife Trust, and also submitted on behalf the Surrey Nature Partnership (SNP).

The site is in a particularly sensitive location for the purpose of biodiversity conservation. Some 0.3 km to the west is the Horsell Common Site of Special Scientific Interest (SSSI), part of the Thames Basin Heaths Special Protection Area (SPA). These are statutory protected site designations and we would refer you to the legal regulatory agency, Natural England, on this matter. Although accessible to the public, the biodiversity interest of the SSSI/SPA remains highly vulnerable to disturbance by inconsiderate visitors and consequently this has to be carefully managed. It is our opinion that the potential increase in such disturbance resulting from a nearby, significantly large new housing development would be very difficult to accommodate without detriment to the biodiversity interest. Immediately adjacent to the proposed development site are two non-statutory Sites of Nature Conservation Importance (SNCI), identified under the adopted procedures for Surrey<sup>1</sup>. To the west is the New Zealand Golf Course SNCI, which includes remnants of Lowland heathland and acid grassland habitats of similar value to those within the SSSI. To the north-east is the Birch Wood & Hoyt Wood SNCI, both featuring ancient Wet woodland habitat, falling within Runnymede Borough. All of these protected sites, together with the majority of the development site, fall within the Woking Heaths TBH05 Biodiversity Opportunity Area (BOA), while a smaller area in the north falls within the R04 River Wey & tributaries BOA.

National Planning Policy Framework paragraph 117 requires planning policy (and hence Local Plan-making) to consider biodiversity conservation at a landscape-scale; recognising the hierarchy of international, national and locally designated sites of biodiversity importance as components of 'local ecological networks', which would also include any wildlife corridors and 'stepping stones' that connect these sites, as well as areas identified by local (including Nature) partnerships for habitat restoration or creation (ie. as within BOAs). An overarching policy aim of utmost priority within BOAs is to avoid impacting existing or potentially improved habitat connectivity between their constituent protected biodiversity sites. A proposal for the extensive development of land between Horsell Common SSSI and the two SNCIs would appear to be entirely inconsistent with this aim. Something on a more modest scale could be possible, and may indeed also seek to enhance habitat connectivity whilst meeting other of the specific BOA objectives of both TBH05 and R04. These can be viewed in the SNP document Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (December 2015).

In conclusion, it is likely that the Land east of Martyrs Lane site will be found unable to support a wholly sustainable development at the scale currently being proposed (ie. that would avoid detrimental impacts on the natural environment).

## Officer Response:

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The Council will make it an essential requirement for the site to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy, Policy DM1: Green Infrastructure Opportunities and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

The nature and type of some of the surveys that will be required to accompany any development proposals will be undertaken at the development management stage. The land will only be released for development as part of the review of the Core Strategy and or the Site Allocations DPD, and that will be the most appropriate time to set out the key requirements for any development to be acceptable. The surveys will make sure that features of environmental, biodiversity and amenity significance are fully assessed and protected from development, where necessary.

Environmental organisations such as yourself, Natural England, Environment Agency and Woodlands Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential integrity of the land can be protected.

**Contributor Reference:** 02304/1/001  
**Customer Name:** Mr Colin Southey

**Summary of representation:**

The representation is opposed to building on the Green Belt, should protect/avoid development on Green Belt so that it remains a green lung for all our health. Brownfield and all other non Green Belt option need to be fully explored and incentivised to add housing towards the targets aimed for.

**Officer Response:**

The justification for the release of Green Belt land to meet future development needs has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper, particularly in Sections 1 and 2. The paper also sets out how the Council has considered and individually assessed brownfield sites across the Borough as a priority for meeting development needs – see Section 11.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. The overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02274/1/001  
**Customer Name:** Mrs Margaret B Walker

**Summary of representation:**

The representations considers that it would be better to use the large area of semi-derelict and pre-developed land to the east and north of Martyrs Lane, rather than removing 6 other sites from the Green Belt and in particular the fields in Pyrford, for the following reasons,

Martyrs Lane land already has planning permission to build a technology centre, which McLarens have decided not to build and another area was a WW II army camp.

There is currently no public access to the land and some is already in public ownership.

In contrast the Pyrford Upshot Lane green belt fields are an important rural landscape feature on the escarpment. They form a critical environmental corridor leading to the Conservation Area and comprise the largest area of heritage pristine green belt. There are public paths on this site, with views of the North Downs, which is popular and used by residents and visitors.

Developing just one site would yield many economies of scale, in providing water, sewerage, gas electricity, access, reduce some traffic, by building schools, shops, leisure and health facilities, rather than further overloading the existing communities overstretched facilities.

There is access to good public transport from the Martyrs Lane site, which is not the case in Pyrford and being near the Six Crossroads roundabout there is good access to main roads in all directions, including the A320 and the M25.

The road network makes for easier access to local employment.

Development of (approx. 1000 homes) is almost certain in West Byfleet and Pyrford before the proposed Green Belt development which will have a significant effect on local roads and already overstretched services and this should be taken into account.

When an attempt was made to remove the Upshot Lane fields from the Green Belt in 1988-1990 the WBC Planning Officer recommended against the proposal. It went to a public enquiry and Mr Noble, the Inspector concerned, stated that this Pyrford area of land was of vital importance in preventing Woking and Guildford becoming a mega-town and should never be removed from the Green Belt.

This will cause least disruption and expense to the borough, least detriment to the continuity of the Green Belt and provide the greatest potential for a viable, satisfactory development.

## Officer Response:

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Consultation Issues and Matters Topic Paper' with particular reference to section 1.0.

Regarding the representation on landscape, it is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

The Council has carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding. Detailed analysis and reasons for this recommendation are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The

Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

If the Council were to decide to safeguard this site or any of the six site, its development will take into account any development proposals in the vicinity of the site, including the developments in West Byfleet and Pyrford.

**Contributor Reference:** 02271 /1 /001  
**Customer Name:** Mr Oliver Williams

**Summary of representation:**

Homes need building. So build.

**Officer Response:**

Support noted and the overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative to deliver the homes required.

**Contributor Reference:** 02321/1/001  
**Customer Name:** Ms Jean Normington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02324/1/001  
**Customer Name:** Ms Linda J Salt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02341/1/001

**Customer Name:** Mrs Valerie Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02348/1/001  
**Customer Name:** Mr Robbie Sampson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02349/1/001

**Customer Name:** Ms Barbara Sampson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02352/1/001  
**Customer Name:** Ms Anne Emerson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02353/1/001  
**Customer Name:** Mr Mustafa Salman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02355/1/001  
**Customer Name:** Ms Heather Allen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02356/1/001  
**Customer Name:** Murtadha Nasralla

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02359/1/001  
**Customer Name:** Satvikananda Saraswati

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02360/1/001  
**Customer Name:** Mr Keith Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02362/1/001  
**Customer Name:** Ms Sharon Lawrence

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02275/1/001  
**Customer Name:** Miss Pippa Ballam

**Summary of representation:**

Lack of transport infrastructure to carry thousands of new homes. Development is based on Government target. There are much better-served areas.

**Officer Response:**

The justification for the release of Green Belt land for development, infrastructure provision and identified the local housing need have been fully addressed as set out in the 'Regulation 18 Consultation Key Issues and Matters Topic Paper, with particular reference to section 1.0, 3.0 and 8.0.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The County Council has also carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02278/1/001

**Customer Name:** Mr And Mrs John And Rosey Foster

**Summary of representation:**

Supports a single site for housing development on land to the east of Martyrs Lane. It has a great number of benefits that outweigh six separate sites or the use of fields at Upshot Lane in Pyrford. These are it is well served with public transport, currently there is no public access to the land, the northern site is publicly owned and has been used for non-agricultural purposes, it is near big employers, road access is good, there would be economies of scale over multiple sites and less impact on existing residents of Woking.

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02840/2/001  
**Customer Name:** Ms Jenny Fowler

**Summary of representation:**

Supports development at Martyrs Lane and reject the Pyrford Fields plans as adopting a single site will enable suitable infrastructure of school, health centre and affordable housing can all be accommodated on this one site. Choosing several other sites would burden the current over-subscribed facilities of schools and health centre. Affordable housing on the Martyrs Lane development, but not necessarily in Pyrford or the other proposed sites.

The Martyrs Lane site seems under-used at present and seems an ideal place to build a really comprehensive development offering the new residents the facilities they will need.

Also there is far more traffic access in the Martyrs Lane area than in Pyrford and West Byfleet. West Byfleet has to contend with the additional traffic that the Parvis Road development will add.

Martyrs Lane makes sense, especially without using the New Zealand Golf Club lane and there is plenty of room there.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

If the Council were to decide to safeguard this site or any of the six sites, its development will take into account any development proposals in the vicinity of the site.

The Council is unclear what the representation was stating regarding 'without using the New Zealand Golf Club Lane'. However, the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

**Contributor Reference:** 02301/1/001

**Customer Name:** Ms Jane Bond

**Summary of representation:**

The representation disagrees strongly with Woking Borough Council's proposal to allocate Green Belt land for development. Green Belt land should not be considered for housing. Green Belt land was originally designated as a green space to act as a 'lung' between urban developments and to prevent 'urban sprawl'. Disappointed that Woking Borough council are putting forward any plans to encroach on such land.

It is not a question of choosing one Green Belt site over another; none should be used. The council should Look at using existing land within brownfield and urban sites. The Council is taking the easy option by opting for Green Belt land.

The consultation documentation mentions previously designated land for building; these areas should be used in preference to Green Belt land. As mentioned in the proposals, there are existing urban sites available for housing and plans should be in place to maximise the space available on these sites to accommodate the number of dwellings required.

There should not be a need for a 'public consultation' to even consider using Green Belt land when Green Belt land has to be protected at all costs.

**Officer Response:**

The justification for the release of Green Belt land for development to meet future housing needs is set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper, in Sections 1 and 2. This also sets out in detail how brownfield sites have been considered and individually assessed as part of the Site Allocations DPD process, under Section 11. This assessment included around 125 sites, the results of which are set out in the Sustainability Appraisal report.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. The overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

As part of the plan-making process, the Council is required by the Town and Country Planning (Local Planning) (England) regulation 2012 to consult at both the Regulation 18 and Regulation 19 stage. The Council has also undertaken an additional round of public consultation to inform its preferred safeguarding option for the purposes of the Regulation 19 consultation. The decision to consult is therefore proscribed by regulations, and is an important part of the plan-making process.

**Contributor Reference:** 02311/1/001  
**Customer Name:** Eunice Watkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02312/1/001  
**Customer Name:** Ms Vivian Watkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02319/1/001

**Customer Name:** Ms Anna Brak

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02273/1/001  
**Customer Name:** Mr Nick Moore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02276/1/001  
**Customer Name:** Ms Jacqueline Ramm

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02302/1/001  
**Customer Name:** Ms Jennifer Ionides

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02303/1/001  
**Customer Name:** Mr George Ionides

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02631/1/001  
**Customer Name:** Ms Christine Gough

**Summary of representation:**

Understands that more houses are required and considering the options, supports the Martyrs Lane proposal excluding the New Zealand Golf Course. Infrastructure could be provided on the site easily.

Any houses should be affordable and not luxury houses. Young couples, single people and retired people need homes.

Strongly object to development on Upshot Lane. Green Belt is needed. Also the infrastructure is at capacity including roads, the school and health centre. The roads are very narrow and congested.

Martyrs Lane could provide new infrastructure as part of the development.

**Officer Response:**

Support for the Martyrs Lane proposal and objection to development in Pyrford is noted.

Whilst the representation suggests excluding the New Zealand Golf Course from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary

infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy, in particular Policy CS10: Housing provision and distribution and Policy CS11: Housing mix, specifically requires new residential development to provide a mix of housing types and sizes to ensure that it addresses the identified local housing need. In addition, Policy CS12: Affordable housing sets out the amount of affordable housing that should be provided on any of the proposed sites as part of any development scheme. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full.

It should also be noted that Core Strategy Policy CS13: Older people and vulnerable groups supports the principle of specialist accommodation including older persons housing. The exact type and nature of development on either of the proposed safeguarding options will be considered in detail as part of a future review of the Core Strategy and or Site Allocations DPD.

Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The representation regarding reasons against development in Pyrford, namely the impact on infrastructure, has been addressed in Section 3.0 of the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02331/1/001  
**Customer Name:** Ms Carole Gale

**Summary of representation:**

Not able to accept the terms of this current consultation because the six sites have not been 'safeguarded' as implied by this consultation. They were proposed in the Regulation 18 consultation, but objections have not been answered. The choice is therefore a false choice which should not have been presented.

Object to the two sites in Pyrford being included in this consultation for the following reasons:

The Green Belt boundary review included the Pyrford sites in Parcel 9. It concluded that the fields serve two critical Green Belt purposes – firstly in restricting sprawl and secondly in safeguarding the countryside from encroachment. The report explains that by critical it means that the continued inclusion of this parcel within the Green Belt it is of paramount importance. It is the highest category of defence possible. For these reasons the parcel is identified by the report as having very low suitability as an area of search based on the assessment of greenbelt purposes.

The report also stated that the land is considered to be in the category of Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The exact agricultural quality of the land has not been established.

The parcel is identified as within or adjacent to 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. The escarpment is considered to be a key landscape feature in the Borough and this is the principle reason that the report considers there to be a major environmental constraint on developing the Parcel.

The rural character of the area would be harmed. The Green Belt boundary review concluded that Parcel 9 has a rural character which ranged from having no capacity to change to low capacity to change. The Parcel falls into the highest categories of constraint to development. Since the report Surrey County Council has conducted a Landscape Character Assessment which also concludes that the area is rural in character and that the fields are important in contributing to this feel.

The councils own sustainability appraisal states that both fields score double negatively in the category 'Conserve and enhance and where appropriate make accessible for enjoyment the natural, historic and cultural assets and landscapes of Woking.'

The decision to put forward the fields for removal from the Green Belt was taken on grounds of availability alone. GB13 wasn't recommended for removal by the Brett report and no subsequent evidence was produced to justify its inclusion. Ashley Bowes has stated:

'I am of the view that the draft DPD is unsound in its current form, in that contrary to s.19(2)(a) Planning and Compulsory Purchase Act 2004, proposed site allocations GB12 and GB13 are not

in accordance with national policy within the NPPF. In particular, the necessary "exceptional circumstances" to justify release of those sites from the Green Belt is not supported by the conclusions of the evidence upon which the Council rely. It is clear the evidence does not support the choice of the two fields.

The choice of the Pyrford fields is based on inadequate evidence and cannot be justified.

The council has marked all previous objections as 'No further modification is proposed as a result of this representation' and given inadequate reasons for doing this. Attached a table showing some of the objections and why the council hasn't answered them satisfactorily.

Reiterate all of the objections submitted to the Regulation 18 consultation, which include concerns about infrastructure including road traffic, affordability, biodiversity, saving agricultural land, air pollution, water and sewerage

The two fields, as noted by the Green Belt Review, are not near a doctor's surgery , secondary school or train station. The primary school and nurseries are all oversubscribed.

Changes to the roads in the Pyrford area are not possible without harming the character of the area. The narrow roads are built on ancient trackways and contribute to the rural character of the area. The B382 Old Woking Road is already a severely congested road and it is uncertain what will be the impact of the enlarged International School (200 to 1100 pupils), development at Sheer House and Broadoaks in West Byfleet, plus possible development at West Hall and Sheerwater. The B367 which runs through the centre of Pyrford is already severely congested during the school run period. The Pyrford Neighbourhood Plan has identified the verges along this route as playing a significant role in contributing to the character of the village and therefore widening of the road is not an option. Pyrford is already under threat from a huge traffic increase from the proposed developments at Garlicks Arch near Burnt Common and the Former Wisley Airfield. The impact of these and other proposed developments will undoubtedly bring further traffic from Ripley via Newark Lane. No traffic studies have been conducted into the effect of all these developments.

The government Housing White Paper recommends higher density building. This is inappropriate in an area surrounded by Conservation Areas. The genuine need for smaller properties would be better met elsewhere.

The footpaths and bridleways in the area are recognised as being of special importance and are used for recreational purposes. The footpaths are ancient and afford attractive views, including uninterrupted views of the North Downs. The Heritage setting of Pyrford Village and the character of the area as enjoyed from the footpaths will be harmed by development of the two fields.

Particularly upset by your response to this:

During the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites.

Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed.

Will pursue this matter with Surrey Wildlife Trust. There will undoubtedly be a loss of biodiversity regarding the birds and mammals which migrate between Pyrford Common and the farmland. Has spent many hours observing the farmland birds using this area and it is impossible to mitigate this loss.

The south east is an area of high water stress and sewerage systems in the area are considered adequate only to 2026. There has been no serious exploration as to whether the already creaking water supply and sewerage systems could cope with the increased demand. There are known sewerage problems in this area and exacerbating this will affect the water quality of the River Wey.

Background air quality is not considered and poor air quality results in many thousands of deaths every year. The impact of increased traffic on air quality must be taken more seriously.

Objects to the Safeguarding of Green Belt Land.

The government White Paper on housing states that 'authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.'

The Council has identified Green Belt land which is capable of delivering at least 900 dwellings during the current plan period, well over the 550 homes targeted in the Core Strategy. The intention to revise boundaries such that a further 1,000 units could be delivered in the Green Belt is a decision which cannot be justified.

The eleventh hour inclusion of land to the east of Martyrs Lane as a potential safeguarding site proves that safeguarding is an inadequate method of producing enduring Green Belt boundaries. Safeguarding results in the blighting of Green Belt land. There is also a great danger that because of the Duty To Cooperate, that these sites will be brought forward to satisfy housing need in other areas. This contradicts the government's commitment to protect the Green Belt, reaffirmed in the Housing White Paper.

Regarding the Council's response to the representors Regulation 18 consultation representation:

Pyrford land is used for agricultural purposes – An enquiry to Natural England, which is responsible for classifying agricultural land stated that the data they have 'does not show the breakdown of Grade 3 into Subgrades 3a and 3b' 'Consequently, it is not suitable for site specific assessments, for which a more detailed field survey may be needed.' GBBR 3.3.20 states The data relating to Agricultural Land Classification has been obtained from Natural England. At this strategic level, there has been no differentiation available from their data on whether land is classified as 3a or 3b.

It is not possible to state that 'this particular site is of low soil quality.' The NPPF paragraph 112 states that 'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land.' This it considers to be 'Land in grades 1, 2 and 3a of the Agricultural Land Classification.' Without a more detailed survey it is not possible to dismiss the possibility that the two fields should be protected for their agricultural value.

Amenity and recreational value of the land and the suitability of the site for development as set out in the Green Belt boundary review –

If you remove Green Belt land which is serving critical green belt purposes, as demonstrated by the GBBR, then of course you will undermine its purpose and integrity. The available evidence shows that the sites are far from being the most sustainable when compared to other alternatives.

Here are the results of the sustainability appraisal:

- o accessibility to services and facilities – scores negatively  
not near to town centre, secondary school, GP
- o conserving and enhancing biodiversity – Scores negatively
- o Conserve and enhance and where appropriate make accessible for enjoyment the natural, historic and cultural assets and landscapes of Woking – scores double negatively

It is irrelevant to talk about how much land is being released in terms of percentages. Green Belt land serving clear Green Belt purposes, which is also unsustainable, should not be released full stop.

The Topic Paper section 7.0 supports the argument that the two fields should not be removed from the Green Belt. The Topic Paper considers the Brett report to be 'robust and well considered.' The Brett report considers Parcel 9 (GB12 and GB13) to have a major environmental constraint because of the escarpment and rising ground of landscape importance. It considers the landscape to have no or little capacity for change. In addition the Surrey Landscape Character Assessment (page 48) makes it clear that the fields contribute to the rural feel of the area. On all the evidence the fields are extremely important to the character of the area.

The LDA response can not be found so unclear whether it has been taken into account.

The NPPF expects Green Belt to be retained and allocation of the site goes against CS1 and the Green Belt boundary review – The sustainability report does not support the selection of GB13. The Council ignored all the evidence to include this site, including the Landscape Character Assessment. GB13 is adjacent to the Pyrford escarpment, a key landscape feature in the Borough protected by Core Strategy Policy CS24, it was assessed as having a strong unspoilt rural character and having no or low capacity to change.

GB13 was not recommended in the Green Belt boundary review and goes against advice from DCLG that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.

1.12 The focus for consideration for the DPD should be about ensuring that the proposed allocations and or any other preferred alternatives are the most sustainable when compared against other reasonable alternatives. The site is nowhere near the most sustainable.

1.13 The Council is satisfied that the proposals in the Site Allocations DPD achieve the above objective. The Site Allocations DPD is informed by robust evidence, including, the Green Belt boundary review...The views of the general public has also been considered and taken into account. The Green Belt Review is not robust evidence and the views of the general public have not been taken into account.

2.2 it is very unlikely that another Green Belt boundary review will produce a different outcome to the Peter Brett Green Belt boundary review used to inform the Site Allocations DPD. It should produce another outcome if done without placing total reliance on availability.

17.1 It is important to emphasise that the Green Belt boundary review is only one of a number of evidence base studies that has been used to inform the DPD. Other evidence base studies such as the Sustainability Appraisal Report, Transport Assessment have also played a key role in informing the DPD. The other studies do not support selection of this site.

All the above show the weakness of the Topic Paper response to the inclusion of GB13 – all the evidence clearly shows that it is not a suitable site for removal from the Green Belt. Availability alone is not a sufficient reason.

GB12 is adjacent to the Escarpment and has unique landscape character – GB12 is adjacent to the Pyrford escarpment, a key landscape feature in the Borough protected by Core Strategy Policy CS24. The Landscape Character Assessment assessed the parcel as having a strong unspoilt rural character and having no or low capacity to change.

GB13 has a unique landscape character and publically accessible. GB13 is adjacent to the Pyrford escarpment, a key landscape feature in the Borough protected by Core Strategy Policy CS24. The Landscape Character Assessment described the parcel as having a strong unspoilt rural character and having no or low capacity to change. The Surrey Landscape Character Assessment considers the fields in the area to contribute to the rural character of the area. This is an interconnected landscape where the fields provide a setting for the many Heritage features in the area, they cannot be considered in isolation. There is an ancient public right of way running alongside GB13 which is an essential component of the connectivity in this rural landscape. It shows a total disregard for the unique nature of this area to suggest that a pedestrian and cycle way through a large scale housing development would be an asset.

The Sustainability Appraisal recognised the importance of the heritage and landscape of this site:

Conserve and enhance and where appropriate make accessible for enjoyment the natural, historic and cultural assets and landscapes of Woking – scores double negatively The land has not been assessed in detail so no statement can be made about the agricultural quality.

The Borough has not followed a correct procedure in arriving at the field GB12 to be safeguarded for future development between 2027 and 2040 – The Green Belt Review selects parcel 9 but provides no evidence to support this decision as the decision is based on

availability. All the other evidence does not support this decision either. Here are the results of the Sustainability Appraisal for example:

- o accessibility to services and facilities – scores negatively  
not near to town centre, secondary school, GP
- o conserving and enhancing biodiversity – Scores negatively
- o Conserve and enhance and where appropriate make accessible for enjoyment the natural, historic and cultural assets and landscapes of Woking – scores double negatively

The LDA Design submission and response can not be located online.

The Borough has not followed a correct procedure in arriving at the field GB13 to be safeguarded for future development between 2027 and 2040 – This answer is cut and pasted, resulting in mistakes such as referring to GB12 when it should be addressing GB13.

#### **Officer Response:**

The preparation of the Site Allocations DPD is the formal process that will ultimately confirm the status of each of the sites designated within it, including those that are earmarked for safeguarding. The sites that have been identified in the Regulation 18 version are those that the Council had proposed for the purposes of safeguarding if it is examined and approved. The Land to the east of Martyrs Lane Consultation Document is careful to use the term 'proposed sites' and the introduction to the draft Site Allocations DPD also makes it clear that the sites are proposed at this stage.

The Council published the draft Site Allocations DPD for public consultation between 18th June and 31st July 2015. The publication of the draft document was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document clearly identified a number of sites that would be safeguarded for future development needs between 2027 and 2040. To clarify, the draft Site Allocations DPD safeguarded the following sites for future development needs:

GB4: Land south of High Road, Byfleet

GB5: Land to the south of Murray's Lane, Byfleet

GB9: Woking Garden Centre, Egley Road, Mayford

GB10: Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford

GB11: Land to the north west of Saunders Lane, Mayford

GB12: Land rear of 79–95 Lovelace Drive, Teggs Lane, Pyrford

GB13: Land east of Upshot Lane and south of Aviary Road, Pyrford

As well as clearly identifying specific sites for safeguarding, Paragraph 216 of the National Planning Policy Framework (NPPF) states that at this stage of the process, the document can be afforded very limited weight in the determination of planning applications. Therefore despite not being an adopted Council document, it does form part of the emerging Development Plan for Woking Borough.

Based on the above, whilst the Site Allocations DPD has not been adopted by the Council at this stage it is clear that the formal plan making process has started and that the Martyrs Lane consultation document was correct in identifying the original sites as 'safeguarded sites in the draft Site Allocations DPD'.

Objection to the possible safeguarding of Green Belt land in Pyrford for future development needs (referred to as GB12 and GB13) is noted.

Where the representation has repeated comments, for example on matters of landscape or agricultural land classification, officers have only responded once to avoid repetition.

Regarding the representation on the land availability, availability of land is a significant material consideration for the Council to take into account in deciding its preferred approach to safeguarding for the purposes of the Regulation 19 consultation. Paragraph 182 of the NPPF deals with examination of local plans and it requires the Council to only submit a plan for examination which it considers sound. Amongst other things, to be sound, the plan:

- o Should be deliverable over its period;
- o Should be the most appropriate strategy when compared against the reasonable alternatives, based on proportionate evidence.

Footnote 11 of the NPPF provides clarity on what a deliverable site is. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Whilst five years is emphasised in the footnote, its relevance should be seen in the context of the details of the representations received from the owners of all seven proposed safeguarded sites at both the Regulation 18 stage and Martyrs Lane consultation.

As part of the Site Allocations DPD process, the Council has written to landowners of all of the sites in the DPD, to confirm the deliverability of the sites included within it. As set out in the draft document, the six proposed Regulation 18 safeguarded sites are considered to be deliverable based on the information submitted by the landowners. As part of the Martyrs Lane consultation, the Council has written to the various landowners within the site boundary. For information, the New Zealand Golf Course and McLaren Technologies Limited have confirmed that the land in their respective ownership will not be made available for residential development. It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the Martyrs Lane site is the most sustainable when compared with the original six safeguarded sites.

It is a matter of fact that the site referred to as GB13 in the draft Site Allocations DPD was not recommended for release from the Green Belt for development purposes in the Green Belt boundary review. The Council, as stated in the Regulation 18 consultation Issues and Matters

Topic Paper, has not taken forward the entire recommendations of the Green Belt boundary review. This, for example, includes Site 7 (land to the east of Byfleet) which was not included in the draft Site Allocations DPD based on flooding and development viability reasons. It is again highlighted that the Green Belt boundary review is just one report within the Council's evidence based that it has used to inform the Site Allocations DPD. Based on the collective findings of the evidence available, it is considered that GB13 along with the other five proposed safeguarded sites, are the most sustainable when compared against all other reasonable alternatives. The Sustainability Appraisal (SA) process has been used to appraise reasonable alternatives sites. It is objective-led and has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. It also sets out why specific sites were either selected or rejected.

The views of Councillor Bowes on the soundness of the draft Site Allocations DPD have been considered by the Council at its meeting on the 20th October 2016. The Council, on the recommendations of the LDF Working Group, took the decision to consult on the land to the east of Martyrs Lane as a possible substitute for the six sites originally identified for safeguarding in the Regulation 18 version of the Site Allocations DPD. The consultation will inform the Council's decision on its preferred safeguarding option for the Regulation 19 consultation and subsequent Examination.

The Council has responded to each of the representations made during the Regulation 18 consultation and taken them into account. The Council's response to each of the 32,712 separate representations can be found online. Although the particular representations made by the representor did not result in any proposed modifications to the document, the comments were carefully considered and addressed. The fact that the representation did not result in any modifications does not mean that it was not considered.

Regarding the lack of infrastructure in Pyrford, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

As set out in the list of transport evidence base documents above, the Council has carried out an assessment of the development impacts of the Site Allocations DPD in combination with the development proposals within the wider area. This study is on the Council's website.

Regarding the Housing White Paper: Fixing Our Broken Housing Market, the White Paper sets out a number of proposed amendments to the NPPF in paragraph 1.53. The first proposed amendment seeks to increase housing density where there is a shortage of land for meeting identified housing need and the second proposed amendment seeks to increase residential density in urban locations that are well served by public transport. However it should be noted that the third proposed amendment set out in the White Paper seeks to ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs. This is broadly consistent with the policies of the Core Strategy and the Development Management Policies DPD as well as the design principles set out in the Woking Design Supplementary Planning Document (SPD). Therefore development of any of the proposed Green Belt sites, including those proposed to be allocated for safeguarding, should be designed to the highest design standards and ensure that housing density does not affect the quality and character of an area and the general well-being of residents.

The heritage and amenity value of the sites are noted and the relative merits of the sites will be considered by Members as part of the Site Allocations DPD process. These landscape features are already highlighted in part in the Surrey Landscape Character Assessment (2015). Whilst this part of the Green Belt provides amenity/recreation value, the overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

Regarding the representation on biodiversity, the Council has consulted with the relevant statutory and non-statutory consultees on this matter and their representations have been taken into account in preparing the Site Allocations DPD. The Council is committed to working with these consultees during the plan making process and beyond to ensure that any of the sites allocated or safeguarded for development do not have a significant harmful impact on biodiversity that can not be mitigated.

The Council has consulted with the relevant utility providers as part of the on-going Site Allocations DPD process. As specifically set out in paragraphs 3.9 and 3.10 of the Regulation 18 consultation Issues and Matters Topic Paper, there is no risk to water supply over the plan period as a result of planned development, whilst Thames Water has provided specific wording

to be incorporated into the key requirements of specific sites to ensure that wastewater and sewerage infrastructure needs of development are fully assessed and where necessary mitigation provided as part of the development management process.

The environmental implications of development, regardless of whether it is in Pырford or elsewhere, will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

The requirement to safeguard land for future development needs as part of the plan-making process is set out in paragraph 85 of the NPPF, in particular bullet points 3, 4 and 5. As set out in the draft Site Allocations DPD, the land to the east of Martyrs Lane consultation paper and the Regulation 18 consultation Issues and Matters Topic Paper, the Council is seeking to establish the principle of safeguarded land to ensure the development plan is in general conformity with the requirements of the NPPF. The release of these proposed safeguarded sites for development will only be considered following a review of the Core Strategy and or the Site Allocations DPD. The Council has also sought legal opinion on the requirement to safeguard land for future development needs. The legal opinion, as set out in the Minutes to the LDF Working Group (1st July 2016), stated that 'It has been suggested that the Council does not need, either through the Green Belt boundary review or the draft Site Allocations DPD, to identify land or sites to meet the projected housing need for the period 2027 to 2040. However, I consider that, hitherto, the Council has clearly adopted the right approach and would be committing a justiciable error if it proceeded otherwise'. It concluded by stating that 'The Council has adopted the correct approach in seeking, through the Green Belt boundary review and the Site Allocations DPD to identify land or sites to meet the projected housing need for the Borough in the period between 2027 and 2040'. The Council therefore considers the Site Allocations DPD, and in particular the safeguarding of land for future development needs between 2027 and 2040, to be consistent with national planning policy.

Matters regarding the Duty to Cooperate have been addressed by the Council in the Duty to Cooperate Bodies Topic Paper.

The Council's response below is to the 'CG Comments on the WBC Response', which refers to the Council's Regulation 18 response.

Regarding agricultural land classification, as part of the preparation of the Site Allocations DPD process, the Council has undertaken a review of agricultural land quality within the borough. This has included reviewing the Agricultural Land Classification Database as shown on the DEFRA website. This database is produced and maintained by Natural England.

In addition, the Council has consulted with Natural England as part of the Site Allocations DPD process. Natural England has not raised any objections regarding the agricultural quality of any

of the sites identified for release from the Green Belt for development needs. Natural England's representation to the Regulation 18 consultation and Land to the east of Martyrs Lane consultation are available to view on the Council's website. The representation also makes reference to the Green Belt boundary review regarding this matter. The report states that for Parcel 9, the agricultural land classification for the land adjacent to the urban areas is classified as 'urban' which is consistent with the Regional Agricultural Land Classification Maps produced by Natural England.

As set out in table 3.2 of the Green Belt boundary review, all parcels of land except for parcels 3,5,6 and 29 of are significant, major or moderate importance to the purposes of Green Belt to some degree. The purpose of the Site Allocations DPD is to allocate sites for development, safeguard land for future development needs and allocate sites for SANGs (suitable alternative natural green space). This plan led approach will make sure that any land released for development is the most sustainable when compared against reasonable alternatives. If the Council were to go against the recommendations of the Core Strategy Inspector and not prepare a Site Allocations DPD, then it would increase the risk of speculative and opportunistic unplanned development in the Green Belt based on a lack of housing supply. This could, based on the Council's evidence, have a far greater impact on the purpose and integrity of the Green Belt compared to the sites identified by the Council. This unplanned growth could also have significant impacts on the provision of essential infrastructure and services. It is therefore critical that the Council proceeds with the Site Allocations DPD process and identifies specific sites in both the existing urban areas and the Green Belt for existing and future development needs.

Whilst the Housing White Paper reconfirms the government's commitment to protecting Green Belt land, the White Paper does not propose any material change in national Green Belt policy. The Core Strategy was prepared and found sound in the context of the NPPF and in particular the Green Belt policies within it.

Regarding accessibility to services and facilities, it is correct that GB12 and GB13 are not within reasonable walking distance of Woking town centre or an existing secondary school. Nevertheless they are within a reasonable walking and cycling distance of Pyrford Neighbourhood Centre which meets the day to day needs of local residents. They also benefit from a limited public transport service. The Council recognises that regardless of what sites are safeguarded for future development needs, it will be necessary to work with bus service providers to improve service provision and frequency.

Whilst the site scores negatively on conserving and enhancing biodiversity, the Sustainability Appraisal sets out a number of potential mitigation measures that could minimise the impact of development on this sustainability criteria. It should also be noted that when compared against the alternative sites in the SA Report, the scoring for GB12 and GB13 is broadly similar with the other Green Belt sites for this particular sustainability criteria. Therefore on this matter there is little or no advantage between these sites and the alternative sites considered by the Council.

The reasons why the sites scored a double negative for conserving and enhancing the natural, historic and cultural assets and landscapes of Woking are clearly set out in the SA. The SA however identifies that the impacts could be mitigated by detailed site layout and design to retain as much openness as possible and landscape buffers to reduce the visual impact of development. For GB12 in particular, this is similar to the recommendations set out in the Green Belt boundary review. The conclusions of the Green Belt boundary review state that 'the landscape assessment notes that this site (GB12) is more discrete, partly contained by trees and set beyond the prominent slopes to the east. The site is therefore under consideration for release from the Green Belt'.

The impact of development on the escarpment can be reduced by reducing the amount of residential development and increasing the proportion of open space allocated for GB13, as set out in the SA. The matters regarding detailed site layout and the provision and distribution of open space within the site would be considered and dealt with at the development management stage.

The Surrey Landscape Character Assessment defines the landscape character of the wider Surrey area and provides a detailed assessment of the land to the south-east of Woking (parcel SS10: Woking to Byfleet Settled and Wooded Sandy Farmland) which includes both GB12 and GB13. It does not specifically assess these two sites as the assessment is a strategic one and not site specific. Nevertheless the Evaluation and Guidance of parcel SS10 makes recommendations of how development could be appropriately accommodated within the assessment parcel. Based on this information, the Council is satisfied that development can be achieved within sites GB12 and GB13 without creating a significant adverse impact on the landscape character of the wider area as well as the specific heritage and landscape designations on and in close proximity to the sites.

Whilst sites GB12 and GB13 score negatively on some of the sustainability appraisal criteria, it is important to consider their scoring across all 17 sustainability criteria as well as considering these scores against the other sites assessed by the Council.

The LDA Design response to the Regulation 18 consultation can be found on the Council's website ([www.woking2027.info](http://www.woking2027.info)) and officers can direct the representor to their representation and officer response if required.

The Council considers the Green Belt boundary review to be a robust evidence base document and as such does not intend to revisit the document.

The representation states that the views of the general public have not been taken into account. This matter has been addressed above. Nevertheless it is emphasised that the Council considered all of the representations received as part of the Regulation 18 consultation and responded to each one in turn. The Council also prepared an Issues and Matters Topic Paper outlining the Council's response to a number of similar concerns that were raised by the public and other stakeholders. It is therefore incorrect to state that the comments received from the Regulation 18 consultation were not taken into account.

The representation states that the Transport Assessment does not support the safeguarding of site GB13. The most recent transport study undertaken by the County Highways Authority as well as their representation to the Martyrs Lane consultation states that 'The Martyrs Lane site, in particular with regard to its northern end does not appear to be as sustainable in transport terms as the other Green Belt sites put forward for safeguarding'. This response will form part of the evidence that will be considered by Members in identifying a preferred safeguarding option.

Regarding existing public rights of way, these matters of detail would be considered at the development management stage if the site was safeguarded for future development needs. The Council's response at Regulation 18 regarding new pedestrian and cycle ways simply highlights that development of the site should improve access to and through the site which should help to create sustainable travel corridors. This requirement would apply to any of the proposed allocated sites.

It is considered that the procedural matters of the Site Allocations DPD process are consistent with planning regulations and all legal requirements. These matters of procedure will be considered by an independent inspector at the examination of the DPD as part of the Test of Soundness.

To conclude, the merits of each of the proposed safeguarded sites will be carefully considered by the Council as part of the next stage of Site Allocations DPD process. The representations received as part of this consultation exercise will alongside the evidence base documents inform the Council's decision on its preferred safeguarding option.

**Contributor Reference:** 02294/1/001  
**Customer Name:** Ms Kelly Hayes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02259/1/001  
**Customer Name:** Mr Norman Woolley

**Summary of representation:**

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site, which includes derelict land.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre. Development here would avoid overstressing the road network surrounding originally proposed sites, where traffic impacts would be dispersed.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information,

the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios,

including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are

classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02262/1/001

**Customer Name:** Mr And Mrs Rena And Joe Giardina

**Summary of representation:**

Object to the proposal due to:

1. Loss of green belt
2. Urban sprawl and Fair Oaks development plans
3. Flood risks – due to more covered areas and loss of trees
4. Transport – roads – pressure on existing roads, especially A320
5. Transport – public – lack of public transport
6. Infrastructure – huge stress on existing services and with no plan to build more schools and hospitals in the area. Schools and Hospitals are already over stretched
7. Wildlife – loss of habitat
8. Woodlands – loss of trees and woodland
9. Flight path – development is in flight path
10. Martyrs Lane recycling centre – located right in the middle of proposed development.

**Officer Response:**

Objections are noted.

All of the issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02264/1/001  
**Customer Name:** Mr Paul Hayes

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 02279/1/001

**Customer Name:** Ms Ann Nash

**Summary of representation:**

The development of one area makes it easier to include essential services, rather than putting pressure on existing services in five separate areas. Although the land is a lovely green lung for the area, local residents do not benefit from the golf course.

**Officer Response:**

Support is noted and the merits of the proposal as put forward in the representation will weigh in the considerations by Members.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council is working proactively with infrastructure and service providers such as Surrey County Council as transport and education authority, to ensure existing services have the capacity to accommodate future housing growth, or that new infrastructure is provided if needed.

It should be noted that there are planning policies in the Development Plan for the area that resist the loss of open space and green infrastructure (such as the golf course): currently policy CS17 of the Core Strategy, which lists criteria that any development coming forward on the Martyrs Lane site would have to take into account in order to be supported.

Whilst local residents do not directly benefit from the New Zealand Golf Club, the course is identified as a sports and recreation facility within the Borough, and the loss of it would be considered to conflict with relevant policies of the Development Plan. As with most of the golf courses within the Borough, the course provides an element of amenity and biodiversity value.

**Contributor Reference:** 02284/1/001  
**Customer Name:** Nika Melnikov

**Summary of representation:**

Objects to the proposal due to the massive strain it would place on traffic, schools etc.

**Officer Response:**

Objection is noted.

The issues raised in the representation about impacts on local infrastructure are addressed in detail in the Horsell and Woodham Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02291 /2/001  
**Customer Name:** Mr Rory Forsyth

**Summary of representation:**

The proposed development would change the character of the area irrevocably, and for the worse.

**Officer Response:**

Objection is noted.

The likely impacts on the character of the area are described in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02333/1/001

**Customer Name:** Mrs R E Jarvis

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

It is close to major employers.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without

the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02260/1/001  
**Customer Name:** Mr Simon Curry

**Summary of representation:**

Supports the proposal as it would allow a new, cohesive community to be built and thrive in one place, as opposed to lots of different areas.

Would direct new development to one area, and the associated construction/roadworks.

Lower quality Green Belt – rough woodland.

Good proximity to M25, reducing the burden on the A3. Good access to Lockfield Drive area.

Opportunities for jobs at local employers, and in Chertsey and Woking.

Easily accessible for Woking Rail Station, avoiding congested areas of town.

Opportunity to include Traveller sites, and to provide social housing.

Once the school and leisure centre in Mayford are up and running, the traffic will become worse – especially that associated with large events on the running track every summer weekend. Better to redistribute development towards the north of Woking.

**Officer Response:**

Support is noted.

The merits as set out in the representation are noted and will weigh in the balance of considerations by Members.

In terms of impacts on the Green Belt:

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is

potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

In contrast, the Peter Brett report recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging impacts on landscape, for example. Detailed analysis and reasons for this recommendation are set out in the report.

In terms of accessibility of the Martyrs Lane site and traffic impacts:

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including those sites proposed in the south of the Borough as referenced in the representation.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Regulation 18 Consultation Issues and Matters Topic Paper addresses the concern about potential traffic impacts in the Mayford area of the Borough, particularly at Section V (but also Sections 3, 20, D, F and U).

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

In terms of providing a mix of accommodation:

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council

also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

In terms of employment opportunities:

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Finally, Officers are confident that planning policies of the Development Plan for the area would deliver sustainable developments that would integrate well with existing communities at the originally proposed sites, equally as well as enabling the delivery of a new community at Martyrs Lane.

**Contributor Reference:** 02337/1/001  
**Customer Name:** Neil And Hanna Barclay

**Summary of representation:**

Support the proposal due to:

- Site suitability: a size possible to accommodate a large number of different dwellings which can easily help fulfil Woking's housing needs.
- Local economy: large employers nearby, benefitting local residents.
- Transport: site is near large air and ground transportation hubs.
- Environmental: no national or local designations or flood risk.
- Planning: unused land on parts of the site which have been granted planning permission, implying it has been deemed acceptable for development. Can also coordinate planning with Sheerwater redevelopment.

The development of the site would help meet CS12 and CS13 obligations (affordable housing, older people and vulnerable groups).

**Officer Response:**

Support is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of a large number of new homes as required by the Core Strategy. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Proximity to the motorway and Heathrow Airport is acknowledged. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of

79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site, including its landscape sensitivity, are set out in paragraph 3.5.11. The site is considered to have a low capacity for change, and development would lead to significant adverse effects on the landscape pattern and features. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

Finally, the requirements of policies CS12 and CS13 of the Core Strategy would apply to all options for future development, as they are all of a sufficient scale to warrant the inclusion of a mix of housing that meets the needs of the Borough. Residential development at any of the safeguarded options should be able to meet the affordable housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02265/1/001  
**Customer Name:** Mr Julian Walker

**Summary of representation:**

Supports the proposal (excluding golf course) as it will have the smallest impact on the environment and infrastructure.

Pyrford sites are in agricultural use, whereas Martyrs Lane site is largely previously developed land, or derelict.

The impact on the continuity of the Green Belt will be less severe.

The northernmost field already has planning permission albeit for industrial use.

When, in 1988, there was a proposal to allow development on the Rowley Bristow site and the adjacent fields (those now designated) there was a full enquiry, which culminated in the Inspector (Mr Noble) stating most emphatically that there should be no development south of Aviary Road as the steep bank, between it and the fields formed a natural break. He said that to go further would risk virtually unlimited spread in that direction.

Part of the Martyrs Lane site is Council owned and as land prices affect the achievement of affordable housing, it would be a good opportunity to facilitate lower cost development in this area.

Infrastructure around Pyrford is overloaded (e.g. roads and sewers). Little opportunity to improve the roads and extra load would cause extra traffic. Martyrs Lane has better transport links. There are economies of scale with infrastructure investment here.

The Burhill Estates Company clearly have a very large financial incentive to get their farmland developed, but this should not be allowed to influence the selection of sites.

Queries why the Martyrs Lane site was previously overlooked.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming

the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Whilst it is correct that the Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is acknowledged that part of the Martyrs Lane site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

According to studies commissioned by the Council, the impact on the Green Belt will not, in fact, be less severe. The Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after

acknowledging the references made in the representation (on urban sprawl). Detailed analysis and reasons for this recommendation are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding. It should be noted, however, that the Green Belt boundary review is of the view that through good quality design and landscaping, development on the Pyrford sites can be achieved without compromising landscape character.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The merits regarding economies of scale associated with infrastructure provision are noted and will weigh in the balance of considerations by Members. The Council will, however, make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council acknowledges residents' concerns about overstressing of local services, but the Council is proactively working with its partners to public specific strategies and programmes to address any capacity shortages, and to deliver new infrastructure. Section 3 of the Regulation 18 Consultation Issues and Matters Topic Paper provides further details.

Regarding impacts on the transport network: the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Regulation 18 Topic Paper referred to above sets out a detailed response to concerns about transport infrastructure relating to the originally proposed sites, at Sections 3, 20, D, F, U and V.

The ownership and availability of land has not been used as a criteria to determine whether or not land should be released from the Green Belt. However, in accordance with national planning policy the availability of land is a significant consideration that the Council has to take into account. Footnote 11 and 12 of the NPPF is clear to emphasise that to be considered deliverable, sites should be available. This is necessary to ensure that any land that is identified for development has a realistic prospect of coming forward for development.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

**Contributor Reference:** 02237/1/001  
**Customer Name:** Mr Stephen Keyes

**Summary of representation:**

Supports the proposal. Development near these major local employers would maximise the infrastructure already in place here, leading to effective economic development.

**Officer Response:**

Support is noted.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The local economy in these locations would also therefore benefit from additional population growth.

**Contributor Reference:** 02240/1/001  
**Customer Name:** Ms Sarah Plastow

**Summary of representation:**

Supports the proposal.

Better to have one area of development, where new local amenities can be incorporated (e.g. doctor's surgery), than shoe-horn a large number of new homes into the over-developed areas of the Borough.

New Haw and Woodham have seen little housing development, and the residents of Woodham wouldn't experience a massive impact from this one site.

Martyrs Lane site already has suitable road access to the site i.e. the A320.

**Officer Response:**

Support is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is acknowledged that there are main roads surrounding the site. However, the proposal would have an impact on traffic as follows:

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is

submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02281/1/001  
**Customer Name:** Mr Robin Milner

**Summary of representation:**

Supports the proposal.

No more than 1,024 houses should be built, thus the golf course is not needed.

Martyrs Lane site has previously developed land is partially derelict.

Considerable economies of scale from developing a single site rather than six.

With such close proximity to the A320 main road, there should be less traffic congestion than that which might be generated at the other six sites.

Access to just the one site should also ensure greater road safety.

The site is big enough to be able to cater for the required infrastructure needed by 1024 families i.e. doctors surgery ,school and transport links.

**Officer Response:**

Support is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

In terms of traffic impacts: the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of road safety, there are robust Development Plan policies to make sure that any proposal for the development of any of the site options do not adversely affect road safety. A key requirement would be to ensure development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts (direct or cumulative). Transport Assessments and Travel Plans would be required for individual development proposals at the Development Management stage.

The merits of providing infrastructure at a single site as put forward in the representation are noted and will weigh in the balance of considerations by Members. The Council will, however, make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02285/1/001  
**Customer Name:** Mr Michael Green

**Summary of representation:**

Objects to proposed development in Pyrford due to:

– adverse impacts on road safety and traffic on roads around Pyrford School – Upshot Lane is already a bottleneck and minor accidents have already occurred here.

Supports the development of around 1,000 homes on land to the north of Martyrs Lane (excluding the golf course). Any more homes would considerably increase traffic problems on the A320 and Woodham Lane.

Any new development here must include a new health centre (West Byfleet Health Centre is at capacity); a new primary school (other local schools are already heavily subscribed); and a proportion of affordable housing so that first-time buyers can get onto the property ladder.

**Officer Response:**

Support for Martyrs Lane, with conditions, is noted.

The Regulation 18 Consultation Issues and Matters Topic Paper sets addresses in detail concerns about adequate transport infrastructure associated with the originally proposed sites.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is true to say that development at Martyrs Lane will have an impact on traffic on surrounding roads. The Council has carried out the following separate studies to quantify and forecast

vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the Martyrs Lane site in terms of providing new, supporting infrastructure are noted and will weigh in the balance of considerations by Members. The Council acknowledges residents' concerns about overstretching of local services, but the Council is proactively working with its partners to public specific strategies and programmes to address any capacity shortages, and to deliver new infrastructure. Section 3 of the Regulation 18 Consultation Issues and Matters Topic Paper provides further details.

The Council will also make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02288/1/001

**Customer Name:** W J Pugh

### **Summary of representation:**

Objects to the proposal because:

1. The whole of the site falls within the green belt. When the Council granted planning permission to McLaren to build a technology centre on their existing site in 2015 it was agreed that Plan/2011/0823 would be revoked.
2. The largest part of the land is given over to recreational open space (an 18 hole golf course) with the development of other areas of the Borough the need for recreation, in particular open air recreation, will become vitally important.
3. The site is adjacent to Horsell Common which is a SSSI and has protection status (SPA) this includes a development protection zone. Much of the proposed land falls within in the protection zone.
4. Much on the land, to the north along the River Bourne, which is not part of the golf course, falls within zones 2–3 of the Environment Agency Flood Planning map. If the proposed land is developed the associated roads and surface water drainage would further exacerbate the risk of flooding and need Environment Agency approval which would be unlikely.
5. The access to the site would be via the A320 and Woodham Road both of which at the moment suffer from considerable congestion at peak times of the day. There would also need to be a large amount of supporting infrastructure e.g. roads, schools, surgery etc.
6. The existing sites that have already been safeguarded for development throughout the Borough could be better integrated with little need for additional infrastructure and lead to far less congestion.

For these reasons the proposed safeguarding of this land for development should be rejected.

### **Officer Response:**

Objection is noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses the issues raised in detail, including:

- Likely impact on the integrity of the Green Belt;
- Planning history regarding the revoked planning permission for McLaren land;
- Assessment of flood risk and avoidance of Flood Zones 2–3;
- Transport impacts, including on A320 and Woodham Road, and how mitigation measures would be required;
- Infrastructure provision to support development.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of

the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

The Council acknowledges that any future development on land to the east of Martyrs Lane may result in the loss of recreational open space (ie. the golf course). It should be noted that planning policy in the Core Strategy permits the loss of open space where it can be demonstrated that an alternative and equivalent or better provision is made available in the vicinity, or the development is directly related to the enhancement of the open space. Any planning application coming forward for development at the site would need to take this into account. As part of this consultation, Sport England has been consulted on the proposal and their representation and the Council's response can be accessed for further information.

The merits of safeguarding the originally proposed sites as put forward in the representation are noted and will weigh in the balance of considerations by Members.

**Contributor Reference:** 02293/1/001  
**Customer Name:** Miss Mary King

**Summary of representation:**

Supports the proposal, excluding the golf course.

This substitution involving one site instead of six separate sites would cause the least disruption to residents and traffic as there is currently no public access to the land and would minimise the overall impact of development on valuable Green Belt in the area.

The Martyr's Lane site is well served with public transport and is close to major local employers, such as St Peter's Hospital.

Much of the northern site has already been used for non-agricultural purposes and as part is publicly owned land, its sale would help council tax payers.

A single site at Martyr's Lane would also provide some economies of scale to address the many infrastructure issues concerning the original six sites and additional community services.

It would be disastrous to lose the Green Belt land of the six separate sites, which we would never be able to reclaim once it had gone, when the land to the east of Martyr's Lane would serve the purpose of providing over 1000 houses, without the massive impact and disruption which would be associated with the separate sites.

**Officer Response:**

Support for the proposal is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Regarding the representation on Green Belt value, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. Detailed analysis and reasons for this recommendation are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Hankinson Duckett Associates report (a landscape assessment) specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

In terms of traffic impacts and public transport:

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable

to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Finally, in terms of infrastructure provision: the merits of infrastructure provision at a single site as put forward in the representation are noted, and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of

any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02295/1/001

**Customer Name:** Mr And Mrs David And Sarah Cockburn

**Summary of representation:**

Support the Martyrs Lane proposal.

The site is large enough to accommodate 1200 homes, including affordable housing, accommodation for older and vulnerable people, Gypsy and Traveller accommodation and the necessary infrastructure such as schools, health centres, etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

There are major employers close by which has advantages for employers and future residents.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre. The A320 to the south of Woking is already at capacity before the Hoe Valley School has opened.

The site has no national or local landscape designation unlike the other sites.

Most of the site is within Flood Zone 1 and will make the planning and development process simpler and more cost effective.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater

**Officer Response:**

Support for the Martyrs Lane site is noted. The merits of the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic

employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council acknowledges residents' concerns about overstressing of local services, but the Council is proactively working with its partners to publish specific strategies and programmes to address any capacity shortages, and to deliver new infrastructure. Section 3 of the Regulation 18 Consultation Issues and Matters Topic Paper provides further details.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site

Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor along Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any

development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on environmental considerations, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation on landscape designations. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02282/2/001  
**Customer Name:** Ms Marilyn Wax

**Summary of representation:**

Objects to the proposal.

Such a large and concentrated development would have devastating impact on the environment, wildlife, for local families and to local infrastructure and services – most of which are at breaking point.

The site largely contains woodlands which provide habitat for wildlife. It abuts Horsell Common – a wildlife refuge of importance for ground nesting birds and other species.

If there are no brownfield sites available for development, there must be alternative sites with fewer precious woodlands and wildlife, where environmental impacts would be limited.

Local infrastructure is overburdened e.g. West Byfleet Health Centre which is struggling. Additional resources are not forthcoming to serve such a large number of new families. Pressures on local schools are intense too.

The surrounding roads are gridlocked at rush hour and cannot handle a possible 7,000 additional vehicles. Pollution impacts on the endangered wildlife of Horsell Common should be considered.

There are other options less detrimental to the environment and neighbourhoods.

**Officer Response:**

Objections to the proposal are noted and will weigh in the balance of considerations by Members.

The issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, including:

- Impacts on the environment, including woodlands and wildlife;
- Provision of supporting infrastructure and services;
- Traffic (and associated pollution) impacts and mitigation measures;
- Focusing development at a single location.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure

that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

Finally, the Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail how the Council have assessed previously developed land, and explains the justification for releasing Green Belt land (Sections 1, 2 and 11).

**Contributor Reference:** 02296/1/001  
**Customer Name:** Ms Maggie Pearson

**Summary of representation:**

Objects to the proposal.

As a grandparent of children approaching school age, is well aware of the difficulties in finding placements in good schools in this area. With no plan to build additional schools, the pressure on the existing ones would be unacceptable and would result in larger class sizes and more pressure on amenities.

St Peters is a hospital is already struggling to cope with the needs of the catchment area. A&E does not meet the timescales for treatment and wards are oversubscribed for much of the time. To build such a huge development would only increase the pressures and would be detrimental to existing residents as well as new families on the planned development. Additionally, the Fair Oaks development which is also being considered would further add to this pressure. Were both developments to proceed the pressure would be unacceptable.

GP practices in this area are stretched to the limit e.g. at least one practice in West Byfleet is unable to take on new patients. It makes no sense at all to introduce a further large population into this area further increasing the pressure. It would be detrimental to new and existing residents alike.

Woodham Lane is already coping with more traffic than it should. Every time there is an incident on the M25, traffic gets pushed onto the A320 and Woodham Lane. Traffic jams are already frequent and annoying. The extra pressure that the Martyrs Lane development would cause is totally unacceptable.

The A320 is a major route which already has problems with congestion. To add to this situation is ridiculous and more consideration should be given to the local residents who already suffer from delayed journeys.

There is a serious lack of public transport serving this area leaving people with no alternative but to use cars.

The A320 has had many problems with flooding and there does appear to be a high water table. To remove trees and plants that absorb water would, I fear, lead to further flooding problems.

Objects strongly to the environmental impact due to further loss of Green Belt land. It is the green belt that makes this such a desirable area to live in. It is wrong to build on green belt land rather than looking at brownfield sites. The Fair Oaks development, together with Martyrs Lane, would be serious urban sprawl.

Loss of wildlife habitat is serious consideration, the proposed area is home to deer, badgers, foxes and many other small mammals, reptiles and birds. It is unacceptable to destroy this habitat.

It would have far less impact if there were several smaller developments which would have less impact, enable easier integration, and not put such unacceptable strain on existing schools, hospitals, etc.

**Officer Response:**

Objections to the proposal are noted, and will weigh in the balance of considerations by Members.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses many of the issues raised in the representation in detail, including:

- Provision of necessary infrastructure to support future development, such as schools and healthcare facilities;
- Assessment of traffic impacts (including on the A320 and Woodham Lane) and how mitigation measures would be required;
- Public transport provision and accessibility to local facilities;
- How flood risk would be assessed, and any mitigation measures would be implemented;
- Assessment of the impacts of loss of Green Belt land and likelihood of leading to urban sprawl;
- Environmental impacts of the development, including on wildlife;
- Consideration of the presence of a recycling centre.

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In addition, the Council is working in partnership with infrastructure providers, such as the Clinical Commissioning Groups and Surrey County Council as education authority, to identify future capacity requirements and sources of funding. This work is ongoing, and the Council will continue to take into account nearby proposals such as that at Fair Oaks to determine infrastructure requirements (such as at St Peter's Hospital, or the need for school places) and ensure that the necessary infrastructure is in place to support future development.

The Regulation 18 Consultation Issues and Matters Topic Paper explains in detail how the Council assessed brownfield land before considering Green Belt land. See Sections 1 and 11.

**Contributor Reference:** 02297/1/001  
**Customer Name:** Mr Richard Thompson

**Summary of representation:**

Support the proposal. Owners of The Hoyt, Land between 426–462 Woodham Lane, Woking (within the Martyrs Lane site).

The plot is around 5 acres, bordered by woodland and scrub to the east, south and west boundaries, and with lighter growth and open areas to the interior. The Hoyt is surrounded by developed sites, with individual houses either side, and general housing to the south of Woodham Lane.

There is documentary evidence of an original building, although this is no longer easily apparent on site.

There also appears to be a dropped kerb to the road, at the western end of the southern boundary. A crossover from the main road at this point would be consistent with the position of the original building.

The land has been in the family of some 50 years, who hope that it would be put into good use, appropriate for the community and for the setting. At the moment it is of no benefit to the community – it is inaccessible and merely sits between two private houses. By "coming out" of the green belt it would have no effect on the local area and would assist the Council in meeting their short term and future housing needs, integrated in a controlled and sustainable plan within the new infrastructure of the greater area of the Land to the East of Martyrs Lane.

There are no ownership constraints which may delay or suppress development, and the site will be available for development when the planning framework commences. The site will remain in its natural state until the development comes forward in 2027.

**Officer Response:**

Support is noted, and the Council acknowledges the location and availability of the land.

In accordance with national planning policy (the NPPF), the availability of land is a significant consideration that the Council will take into account. Footnote 11 and 12 of the NPPF is clear to emphasise that to be considered deliverable, sites should be available. This is necessary to ensure that any land that is identified for development has a realistic prospect of coming forward for the anticipated nature and type of development at the time that it is needed.

The merits of the land between 426–462 Woodham Lane in terms of being available for development are therefore recognised, and will weigh in the balance of considerations by

Members. It is agreed that it would be beneficial for the land to be used for the benefit of the community.

However, the overriding consideration for the Council is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed, or whether it is available. Whilst these matters are of material consideration, they are not the primary ones and represent two of many material considerations to be considered.

It should also be noted that whilst this part of the site is available, this is not true of the rest of the site: as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 02313/1/001  
**Customer Name:** Mr Antony Williams

### **Summary of representation:**

Supports the proposal:

– **Environmental:** The Brett report considered Pyrford land to be in category Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The parcel is identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford fields.

– **Landscape character and sensitivity to change:** The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character. The Surrey Landscape Character Assessment says of the land encompassed by parcel 9 'the enclosed farmland, experienced from the public rights of way network, give the area a rural feel.' Pyrford Neighbourhood Plan states of this area that 'The area has one particularly ancient tract around the medieval St Nicholas' Church and the escarpment along Warren Lane and Church Hill. It is believed the area represents one of Surrey's last remaining examples of natural beauty, in a farming setting.'

The Brett Report designated Martyrs Lane as having low capacity for change. The site has no local or national landscape designations. The site has been partially developed in the past and has included both military and civilian dwellings during WWII and in the post-war years.

– **Economies of scale:** One larger site of 1024 properties would provide economies of scale, making it easier to resolve infrastructure issues like water, waste, and electricity when compared with the provision of equal services on 6 separate sites spread across the whole borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by 6 separate sites.

– **Infrastructure:** The selection of Martyrs Lane would allow for a new and efficient infrastructure to be put in place on the northern sites, most likely at a lower cost to that incurred on the 6 original separate sites.

– **Road links:** Martyrs Lane site close to main road links, in contrast to heavily congested, narrow roads in Mayford, West Byfleet, Pyrford and Byfleet village.

– **Amenity value:** Green Belt land in Pyrford is very accessible and actively used by walkers, runners, cyclists and others from all across the Borough. By contrast Martyrs Lane is not easily accessible and as a result is rarely used by the public.

The Martyrs Lane site has physical capacity and space and importantly can incorporate the necessary infrastructure from the outset.

**Officer Response:**

Support is noted.

The references to Peter Brett's report are noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, identifies the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to

protect heritage and landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage or landscape assets of the area.

The merits of allocating a larger site in terms of infrastructure provision are noted, and will weigh in the balance of considerations by Members. Nevertheless, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of traffic impacts and road links:

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet more than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of amenity value: whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It should also be noted that the Core Strategy, the Development Management Policies DPD and the Pyrford Neighbourhood Plan include robust policies to protect and even enhance the features of a site which provide amenity value for current and future residents: there is potential for investment to improve routes used by walkers, runners and cyclists.

**Contributor Reference:** 02327/1/001  
**Customer Name:** Mrs Anne McClean

**Summary of representation:**

Supports the proposal, for 1,024 dwellings avoiding the golf course.

This land would provide significant economic and social benefits and would be far more suitable for development than the six sites identified in the draft Site Allocations DPD.

It would make economic sense to develop one large site with the potential for superior infrastructure, rather than adding infrastructure to six smaller sites where schools and doctors surgeries are already full and traffic gridlocked.

The site includes derelict and pre-developed land, with no local or national landscape designations, some of which has recently been granted planning permission and some being publicly owned.

There is no public access to this site unlike the other proposed sites where the landscape and rural character are enjoyed through public rights of way.

A single site development at Martyrs Lane would affect fewer residents, cause less traffic congestion, provide better employment opportunities and benefit from direct road links to Woking and the M25.

Is against development on any Green Belt land in principle but appreciates that more houses have to be built.

Hopes that the Council has investigated all brownfield options. Queries why this site has only just come to light. Hopes the Council hasn't been influenced by landowners.

**Officer Response:**

Support is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs.

Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains previously developed land – existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to

isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

It is accepted that the land east of Martyrs Lane is in close proximity to employers, and can offer employment opportunities. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail the justification for releasing Green Belt land (Sections 1 and 2), and explains how the Council has explored brownfield land opportunities (Sections 1 and 11).

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. A change in circumstances with part of the land in ownership of McLaren that had occurred since the Regulation 18 version of the Site Allocations DPD was published justified the testing of this land in combination with the other adjacent sites as a reasonable alternative. The conditions attached to the latest planning approval at the McLaren site west of the A320 (PLAN/2014/1297) presented a change in circumstance to justify the Martyrs Lane consultation. Representations received during the consultation will provide useful information to inform Members on their preferred approach to safeguarding. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 02019/2/001  
**Customer Name:** Ms Maria Santos

**Summary of representation:**

Strongly objects to the proposal, due to:

- Detrimental impacts on the environment, wildlife and people living locally;
- Addition of 3,500 dwellings leading to around 7,000 extra vehicles on already congested roads i.e. A320 to M25 and to Woking Town Centre, leading to adverse impacts on roads and wildlife;
- Biodiversity impacts – ground nesting birds and other animals which are in decline due to development;
- Valuable woodlands will be affected – alternative areas without woodland should be prioritised;
- Proximity to Horsell Common;
- Lack of capacity of local infrastructure (e.g. medical centres and schools) – how would extra, new services be funded and resourced.

**Officer Response:**

Objections are noted.

The consultation proposal as stated in the consultation document is for 1200 homes on the Martyrs Lane site and not 3500.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses the issues raised in the representation in detail.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy.

Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 02320/1/001  
**Customer Name:** Mr Thomas Gundacker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02323/1/001

**Customer Name:** Mrs Tahiraj

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02325/1/001

**Customer Name:** Ms Joanne Corkill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02328/1/001  
**Customer Name:** Ms Caroline Ayres

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02329/1/001  
**Customer Name:** Ms Leanne Cowcroft

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01168/2/001

**Customer Name:** M Skilton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02330/1/001  
**Customer Name:** Ms Michelle Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02334/1/001

**Customer Name:** J Graham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02335/1/001  
**Customer Name:** Mr Robert Janson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02336/1/001  
**Customer Name:** Ms Wendy Tompsett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02338/1/001  
**Customer Name:** Mr Grant Alderman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02339/1/001  
**Customer Name:** Mr Malcolm Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02298/1/001  
**Customer Name:** Mr Frank Mundy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02299/1/001  
**Customer Name:** Ms Sue Meads

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02314/1/001  
**Customer Name:** Ms Carol French

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02315/1/001

**Customer Name:** Mr Jon Barber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02316/1/001  
**Customer Name:** Loes Smeets-Barber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02317/1/001  
**Customer Name:** Mr Tony Canning

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02318/1/001

**Customer Name:** Mr Jonathan Halliday

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02235/1/001  
**Customer Name:** Ms Nicki Glazzard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02244/1/001  
**Customer Name:** Mr Mark Draisey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02246/1/001  
**Customer Name:** Mr Stephen Symington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02255/1/001

**Customer Name:** Ms Barbara Barklem

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02256/1/001  
**Customer Name:** Mr Andrew White

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02257/1/001  
**Customer Name:** Ms Melanie Loades

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02280/1/001  
**Customer Name:** Ms Claire Hale

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02282/1/001  
**Customer Name:** Ms Marilyn Wax

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02283/1/001  
**Customer Name:** Mr Adam Gunn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02286/1/001  
**Customer Name:** Ms Alison Martin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02287/1/001  
**Customer Name:** Mr Julian James

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02289/1/001

**Customer Name:** Ms Ann Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02290/1/001  
**Customer Name:** Ms Charlotte Sneddon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02291/1/001  
**Customer Name:** Mr Rory Forsyth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02292/1/001  
**Customer Name:** Ms Jacqueline Harrison

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02248/1/001  
**Customer Name:** Ms Jackie Rulton

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt but do appreciate the need for more housing and the pressures on Borough Council's to provide this.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site, which includes previously developed land.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

It is close to major employers and used for non-agricultural purposes.

The northern site is publicly owned land so the sale would help council tax payers and fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will

only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02660/1/001  
**Customer Name:** Ms Elizabeth Southern

**Summary of representation:**

Supports the Martyrs Lane proposal excluding the New Zealand Golf Course.

Whilst being in Green Belt, planning permission was recently granted for the top part of the site.

The top part of the site includes previously developed land and is now semi–derelict. It is therefore 'lower–grade' Green Belt.

It is used for non–agricultural purposes and there is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes. There are new utilities close to the site (known by the recent disruption to the A320).

The site is well served by public transport unlike the other sites. The site has good access onto the M25 and Woking Town Centre – good for business.

Fewer residents will be disrupted by one site then by six individual sites.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other

constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Regarding the representation on Green Belt quality, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal

of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure, including utility services. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02212/1/001  
**Customer Name:** Ms Patricia Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02651/1/001

**Customer Name:** M H Alder

**Summary of representation:**

Supports the proposal.

It will result in improved access to the recycling centre.

The golf course is not used by local people, and development here can return use to local people.

Proximity to major employers.

Easy access to public transport.

Traffic congestion problems can be mitigated.

Byfleet does not have facilities to cope with additional housing e.g. doctor surgeries and schools.

Development sites at West Hall and Broadoaks are ample to meet the requirement for 550 homes on the Green Belt.

**Officer Response:**

Support is noted, and the merits set out in the representation will weigh in the balance of considerations by Members, such as bringing land into use for the benefit of local people. However, some of the merits associated with the proposal also apply to the other sites originally proposed, which are not currently used by the local community. Development proposals at all of the proposed sites bring an opportunity to improve access to the land e.g. to enhanced green infrastructure, or play facilities.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking

Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council would agree that there are opportunities to mitigate traffic impacts – associated with all the sites under consideration. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure, including, if safeguard, the sites in Byfleet. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council appreciates local residents' concern about the capacity of existing infrastructure to support new development. However, the Council is working in partnership with infrastructure providers to assess the capacity of existing infrastructure to support future development, and identify any shortfall in provision, as well as sources of funding.

As set out in the Consultation Paper, Green Belt land will be needed to meet development needs from 2022 to 2027 – which would be accommodated by proposed allocated sites in West Byfleet, but additional land is required from 2027 to 2040. It is proposed that this additional 1,200 housing could be accommodated on land to the east of Martyrs Lane, which is the topic of this consultation exercise.

**Contributor Reference:** 02664/1/001  
**Customer Name:** Ms Hilary Whittle

**Summary of representation:**

Does not agree any Green Belt land should be built on, but favours Martyrs Lane over originally proposed sites.

McLaren development is withdrawn and gives rise to a 'vacancy'.

There are derelict buildings on parts of the land.

Parts of the site are publicly owned.

Predominantly non-agricultural.

No public rights of way that might be an impediment.

Public transport is available.

Potential to improve adjacent road system.

New housing in this area will have less overall impact than elsewhere.

**Officer Response:**

Support is noted.

The Regulation 18 consultation Issues and Matters Topic Paper sets out in detail the justification for the release of Green Belt land – see Sections 1 and 2.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also

confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The merits regarding public access to the land are noted and will weigh in the balance of considerations by Members. Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this

consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The adjacent road system does offer opportunities to be improved, but this is also true of the road network serving the originally proposed site. The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure, including transport infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The opinion about overall impact is noted. However, there will be implications from developing such a large site – for example, traffic implications. Transport studies commissioned by the Council show that existing levels of congestion are likely to be exacerbated. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

In addition, there may also be adverse impacts on the overall integrity and purpose of the Green Belt at the Martyrs Lane site. The Green Belt boundary review and the landscape assessment by Hankinson Duckett assessed the land with regards to its contribution to the purpose of the Green Belt. The reports concluded that the land was unsuitable for removal from the Green Belt. There would, therefore, be impacts if it were released.

The Council will need to weigh up the impacts of all safeguarding options in making its decision about the best strategy to take forward for Regulation 19 consultation.

**Contributor Reference:** 02656/1/001  
**Customer Name:** Mrs Jean Crowle

**Summary of representation:**

Supports the proposal in favour of developing the Pyrford fields. These fields will need to be retained for future food production.

Martyrs Lane is surrounded by better roads, able to cope with additional traffic.

**Officer Response:**

Support is noted.

It should be noted that the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA, including those in Pyrford.

Accessibility to main roads is noted, however, the traffic impacts of development need to be taken into account. The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. The Regulation 18 Issues and Matters Topic Paper sets out a detailed response (under paragraph 3) to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

**Contributor Reference:** 02655/1/001

**Customer Name:** Ms Diana Lea

**Summary of representation:**

Supports the proposal for new housing and a Travellers site.

Better than constant infilling of already overcrowded areas around Woking.

The site can be supported by proper infrastructure and businesses for employment, and it offers easy access via the A320 and M25.

**Officer Response:**

Support is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of much-needed new housing. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to established, major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy

that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Accessibility to the A320 and M25 is noted. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

**Contributor Reference:** 02643/1/001  
**Customer Name:** Mrs Thelma Powell

**Summary of representation:**

Supports the proposal.

The site is large enough to accommodate 1200 houses, including affordable housing, specialist residential accommodation, and the necessary infrastructure of shops, primary schools, health centre, etc. It is much easier to create the associated infrastructure rather than overloading existing over-stretched facilities. Targets for CS12 and CS13 are not currently being met due to high land values.

It will simplify the process for obtaining planning permission.

The A320 gives easy access to the M25 and Heathrow Airport to the north, and to Woking town centre and the mainline railway station to the south without encountering the traffic delays where roads cross railway lines. Bus routes and cycle routes, including to Woking town centre, exist already. This is a better proposal than the option of building south of Woking where the A320 is often at a standstill in the morning rush-hour and that is before the new Hoe Valley School has opened.

Suitable to accommodate one or more Gypsy and Traveller sites, to replace Ten Acres and count towards the requirement for at least 15 pitches. This would allow Travellers to live East of Woking. Almost all other pitches are at the South West side of the Borough. Any Traveller site would satisfy the Council's Core Strategy (2012), CS14, Gypsy and Traveller pitch criteria.

Any development of Gypsy and Traveller pitches would link in with other broader strategies in place which together deliver housing, pitches, and other uses, services and Green infrastructure in the most appropriate way. Pitches could be designed with the recommended privacy, security and space provisions, whilst the overall residential development could provide open-space and playground facilities.

Gypsy and Traveller pitches within the residential development would enable residents to:

- o Seek or retain employment
- o Attend school, further education or training
- o Obtain access to health services and shopping facilities.

Although in the green belt, the site has no other national or local landscape designation unlike Mayford and Pyrford sites.

Most of the site is clear of Flood Zone 2 and 3.

Much of the land is disused and derelict.

Planning permission has been granted previously, resulting in a presumption for development.

Would provide accommodate for employees of nearby major employers. A new neighbourhood centre here would also create new employment opportunities.

It is large enough to meet all the housing needs of the Borough up to 2040, but also well beyond the 2040 period.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes (nor any additional homes required beyond 2040). For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The merits of the land east of Martyrs Lane as set out in the representation regarding economies of scale, affordable housing and specialist housing are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account. The Council will make sure that the development of

any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking

Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of

Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst development at the Martyrs Lane site would be directed to Flood Zone 1 land, this is also true of the originally proposed sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

6

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree. The merits of the possibility of providing a new neighbourhood centre are noted, and will weigh in the considerations by Members.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01549/3/001

**Customer Name:** M Y Foat

**Summary of representation:**

The land has been used during WW2 as temporary housing and has sport facilities on site. This land should be strongly considered as this brownfield site should be used before greenfield land.

**Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site.

**Contributor Reference:** 00643/2/001  
**Customer Name:** Mrs Heather Fraser

**Summary of representation:**

Object to the plans to build a minimum of 12,000 homes in Woodham. The impact on the town of Woking and residents in the area would be profound. It is difficult to believe that Councillors have been serious in putting the proposal forward.

Woking's greatest asset is its good access to motorways and main roads and it is therefore essential that these roads do not become congested.

The proposed location of the development would affect these roads to such a large extent that they would be grid-locked and congested. The Six Crossroads roundabout to Woodham Lane and St Peters Hospital are already busy roads.

The railways are already facing problems, with the car parks at the stations at capacity. The railway is a great asset to Woking but not if you can't park at the stations. New residents would also require parking facilities at the stations.

There seems to be no plans for the provision of infrastructure which would be essential. There are no plans for schools and Woking already has a problem with school overcrowding and finances with its schools. Development will make the situation worse.

There is already stress on healthcare facilities such as hospitals and doctors. An influx of thousands of extra people will collapse the system.

The thinking public can see why many councillors voted to put the problem in one area rather than spread the load into areas in their constituencies.

The local area is beautiful, with tree lined roads and with easy access to the countryside. The proposal is life changing for existing residents and impractical. Hope that Councillors will come to their senses.

Another concern is the Martyrs Lane Recycling Centre. This is an asset to Woking. Development would cause the road to become grid locked.

Hope that the objections will be considered and acted upon. It is better to spread the problem to lessen the impact.

In summary:

Massive road congestion on vital roads.

The effect on rail travel, as Woking has one of the country's busiest trains already.

Parking at stations is already difficult.

The existing schools are at capacity and under funded.

There would be a significant adverse impact on healthcare facilities and provision. How would the Martyrs Lane Recycling Centre cope with a huge development adjacent to it. It is an asset to the town. The site is in a scenic area with tree lined roads and a golf course, all are all asset to wildlife and to people.

**Officer Response:**

As set out in the Land to the east of Martyrs Lane consultation document, it is anticipated that the site is sufficient to enable the delivery of at least 1,200 net additional homes and the necessary green and other infrastructure to support the potential development of the site. Therefore the 12,000 homes as set out in the representation is far in excess of the consultation proposal.

The representations regarding the road network, infrastructure provision including education and healthcare, the Martyrs Lane Recycling Centre and the railway service have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

In addition, the Council has consulted with Network Rail and the existing train operator as part of the consultation process. The Council is also committed to working with these stakeholders beyond the Site Allocations DPD process to ensure that station facilities are able to meet demand, including cycle and car parking provision. A recent example of station improvements is at Brookwood Station car park which has been decked to provide additional car parking spaces.

Regarding the impact of development on local character, it should be noted that most of the housing need in the Borough is internally generated and it is therefore envisaged that planning to meet that need should not undermine the overall social fabric of the area. The policies of the Core Strategy and Development Management Policies DPD will make sure that development at all of the proposed allocated and safeguarded sites will be built to a high standard and sympathetic to the general character of the area. By supporting development with adequate infrastructure provision it is anticipated that this will minimise any social, environmental and infrastructure pressures in the area. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

Regarding the representation on wildlife, during the preparation of the Site Allocations DPD the Council consulted with Natural England on the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Natural England based on existing biodiversity features that could not be addressed. The Council has consulted with them again as part of this consultation exercise and their comments will be considered.

A number of the proposed allocations will require a detailed ecological survey as a key requirement to assess and address any site specific ecological issues. This will help determine how development is managed on the site.

The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

The representation regarding the decision by councillors to consult on the Martyrs Lane proposal has also been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 02662/1/001

**Customer Name:** Mrs S A Drew

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site is previously developed land and semi-derelict.

The northern site is publicly owned land so the sale would help council tax payers

It is close to major employers and used for non-agricultural purposes

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.

The site is well served by public transport unlike the other sites.

The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

Fewer residents will be disrupted by one site than by six individual sites.

Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02659/1/001  
**Customer Name:** Mrs Mary McCready

**Summary of representation:**

Difficult consultation as all sites are within the Green Belt.  
Support the Martyrs Lane proposal excluding the New Zealand Golf Course.  
Planning permission was recently granted for the top part of the site.  
The top part of the site is previously developed land and semi-derelict.  
The northern site is publicly owned land so the sale would help council tax payers  
It is close to major employers and used for non-agricultural purposes  
There is currently no public access to the land.  
A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues including affordable homes.  
The site is well served by public transport unlike the other sites.  
The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.  
Fewer residents will be disrupted by one site then by six individual sites.  
Support for Martyrs Lane.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. This has been set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the

safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02166/3/001  
**Customer Name:** Ms Tanya Shah

**Summary of representation:**

Better to have less housing spread over the borough than to concentrate it all in one big development. This will cause total chaos on the surrounding roads, schools and doctors surgery. Also we must safeguard the natural habitat of Horsell Common.

**Officer Response:**

The issues regarding infrastructure, roads and nature have been addressed in detail in the in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper' with particular reference to sections 8, 3 and 9.

In addition, it is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 02641/1/001

**Customer Name:** Pat Barnes

**Summary of representation:**

Understand that there is a need for housing, especially affordable housing, in the area and not large houses in the areas around Woking.

Martyrs Lane is ideal as it is close to Woking, Chertsey and Weybridge and these places all have train stations.

There are a number of privately owned golf courses in the area when compared against other sporting facilities. Perhaps sports facilities could be included within the Martyrs Lane proposal.

Hopefully there will be no development near to commons whilst bridlepaths, footpaths and cyclepaths should be considered and new ones created.

Support the proposal. The social needs of Pyrford should not be forgotten if development is located elsewhere in the borough.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

The Borough's housing need has been assessed as part of the Core Strategy preparation and is set out within the Strategic Housing Market Assessment (SHMA). This report has since been updated (2015) and identifies that there is still a significant housing need in the Borough for both open market and affordable housing. These reports are on the Council's website.

The Core Strategy, in particular, Policy CS11: Housing mix, sets out the required housing mix that should be delivered on all residential developments. The housing mix within the policy reflects the housing need within the Borough, including the need for family sized accommodation (2 or more bedrooms). Any future residential development in the borough, regardless of whether it is at Martyrs Lane or any of the other six sites, will be required to reflect the local housing type and mix required to address local housing needs.

In addition, the Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The proximity of the Martyrs Lane site to these centres, as set out in the representation, is noted. The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By

this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

It is acknowledged that there are a number of golf courses within the borough. Whilst it is correct that they are privately owned and operated, it is considered that this is typical of most golf courses.

As set out in the Martyrs Lane consultation paper, if the site is safeguarded for future development needs then development of the site would include the necessary infrastructure to support the potential development of the site. This would include the provision of open space and any necessary sporting facilities. As part of the consultation process the Council has consulted with Sport England and will consider and respond to their representation separately.

The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The exact location and provision of footpaths, cycle routes and bridleways will be considered in detail at the development management stage.

Regarding infrastructure provision in Pyrford, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts. In addition, the Pyrford Neighbourhood Development Plan sets out a number of Community Projects that will be funded in part through any CIL funding that may accrue in the neighbourhood area.

**Contributor Reference:** 02661/1/001  
**Customer Name:** Mrs A W Milne

**Summary of representation:**

Objects to the building of houses on the fields at the end of Upshot Lane.

The main reason is the increase of traffic. The road network in the area, especially near the school is at capacity and dangerous. Also, will the school and doctors' surgeries be able to cope with additional demand.

The main road through West Byfleet is at saturation point and the parking will be totally inadequate.

Wonders if Woking Council ever thinks anything through properly.

The Martyrs Lane option makes more sense as at least the road system would be more manageable.

**Officer Response:**

Objection to development in Pyrford and support of the Martyrs Lane proposal is noted.

The reasons against development in other areas of the Borough, including Pyrford, have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular the representations regarding education and healthcare provision as well as road infrastructure.

In addition, it should also be noted that the Council is working with the Clinical Commissioning Groups (CCGs) to ensure healthcare provision and distribution is in line with planned development.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding parking provision in West Byfleet, the Council has an adopted Parking Standards SPD that states the required amount of car and cycle parking provision that should be provided as part of any development scheme. These standards are currently being updated by the Council to reflect national planning policy requirements and are expected to be adopted by the Council before the adoption of the Site Allocations DPD.

Regarding the Council's overall approach to allocating sites for development and safeguarding, it should be noted that the Council has a substantial and robust evidence base which includes studies on a wide range of matters including infrastructure provision, landscape and Green Belt. These studies and assessments have been used to inform the Site Allocations DPD. This is further set out in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02644/1/001  
**Customer Name:** Mr Gerald Payne

**Summary of representation:**

Support the proposal to safeguard land at Martyrs Lane for future development needs.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads and already have a substantial amount of traffic on residential roads. The existing roundabout on Martyrs Lane would enable easy access to the development.

Martyrs Lane has better bus services than the other sites and enable better access to large local employers.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is

identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor as well as the A320 corridor between Woking town centre and the M25. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 and A320 corridors. This work is on-going and will be completed before the DPD is submitted for Examination.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By

this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02201/1/001

**Customer Name:** Mr And Mrs Michael And Gillian Hamlyn

**Summary of representation:**

The representations considers it should not be necessary to build on any Green Belt sites, but supports substituting the six sites in the draft allocation with the land east of Martyr's Lane but not building on the land on New Zealand Golf Course .

The main reasons are it is one large site would be more economic and the necessary additions to the local infrastructure could be housed on site instead of overwhelming already crowded facilities at the other sites.

The site is adjacent to the A320 which leads to the M25 and Woking , easier for traffic flow , and not driving through villages with narrow roads . The A320 also provides a good bus service, unlike our village the where the bus is every 90 minutes.

With the building confined to one site, fewer residents would be inconvenienced.

The Martyr's Lane site would be ideal for employees of St Peters Hospital , especially if some affordable houses were built on the site.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste

safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Key issues and matters Paper with particular reference to section 1.0.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values.

The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02203/1/001  
**Customer Name:** Ms Joanne Mathews

**Summary of representation:**

The representation objects and does not understand the rationale behind any future large scale housing development in this particular part of Surrey. For the following reasons:

Guildford is the largest town in Surrey, followed by Woking. Other large towns are Farnham (Waverley), Camberley (Surrey Heath) and Ewell (SCC). According to census figures and Borough population statistics, Woking's growth and rate of increase far outstrips that of neighbouring boroughs. According to the Demographic Profile of Woking BC based on the 2011 Census, Woking's increase of 10.4% "is higher than that of Surrey at 6.9%, the South East at 7.9% and England at 7.9% "makes it one of the fastest growing Boroughs in the country."

Woking is the third most densely populated borough out of the twelve in Surrey. Surrey figures seem to indicate that Woking's outstanding growth means that it is time to develop other less densely populated areas of Surrey. Or even look at other less densely populated counties such as Sussex and Hampshire.

The main link roads around the Martyrs Lane site are already very busy roads, including the A320 and B385, being access routes to the M25, Chertsey to Staines, the hospital and M25.

West Byfleet is dominated by the B381 Old Woking Road, which becomes the Parvis Road and Byfleet Road. This road is a main access road to the A3 which is a main route out of London, through Guildford, down to Portsmouth. This is already a very busy road which are exacerbated by the retail and schools.

The area is so built up that it is hard to imagine how the roads can be improved to alleviate current congestion, even if there was available money. How many more people and cars can this area absorb without affecting the quality of life of existing residents.

An influx of people into the area will also impact on local health services. There are no GP practices in Pyrford. The nearest one is the Medical Centre in West Byfleet. GP surgery and A&E is at capacity.

The current residents deserve some consideration when planning further housing developments. Due to over development and urban sprawl, it is difficult to know the difference between the areas.

**Officer Response:**

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

The issue of infrastructure and evidence to support the draft site allocations are also already addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', with particular reference to section 1.0, 3.0, M and 8.0.

Whilst it is noted that the population and population density of Woking is increasing, the Council is fully committed to the comprehensive delivery of the Core Strategy. This includes the delivery of 4,964 dwellings over the plan period. This housing target is based on the local housing needs of the borough and wider housing market area. The Council has a duty to identify its housing requirements and plan for this need. Through the provision of infrastructure and other key services, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

The Council is required to undertake public consultations as part of the plan making process. These consultation periods provide an opportunity for local residents to submit any representations to the Council on the development proposals and highlight any concerns they may have. All representations are considered in detail and are used by the Council to inform its decisions.

The representation regarding urban sprawl has been addressed within the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts

varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The County Council has also carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

**Contributor Reference:** 02203/2/001  
**Customer Name:** Ms Joanne Mathews

**Summary of representation:**

On balance, supports substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course. The reasons are, the top part of the site was recently granted planning permission and there is currently no public access to the land. A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc. The northern part of the site is well served with public transport unlike the other six sites. The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre. The northern part of the site is close to major local employers like St Peter's Hospital and Animal & Plant Health Agency. Much of the northern site has already been used for non-agricultural purposes and part of the northern site is publicly owned land so the sale would help council tax payers. Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites.

**Officer Response:**

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300

dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages

of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future

development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02241/1/001  
**Customer Name:** Mr Chris Mathews

### **Summary of representation:**

On balance, supports substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course. The reasons are, the top part of the site was recently granted planning permission and there is currently no public access to the land. A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc. The northern part of the site is well served with public transport unlike the other six sites. The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre. The northern part of the site is close to major local employers like St Peter's Hospital and Animal & Plant Health Agency. Much of the northern site has already been used for non-agricultural purposes and part of the northern site is publicly owned land so the sale would help council tax payers. Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites.

### **Officer Response:**

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300

dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages

of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future

development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02209/1/001  
**Customer Name:** Mrs Barbara Chapman

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyr's Lane for the safeguarded sites identified in the draft Site Allocations DPD to meet long term future development needs of the borough between 2027 and 2040. However, does not agree to building on the New Zealand Golf Course.

Opposed to development on Pyrford Green Belt due to increase in traffic congestion and a hazard to the community. Also the two fields in Pyrford are integral to the heritage setting of the area.

Supports Martyrs Lane as the top part of the site was recently granted planning permission. There is currently no public access to the land.

Traffic would easily be absorbed as there are very good main roads surrounding the Martyr's Lane site. The northern part of the site is well served with public transport unlike the other six sites.

This single site would easily accommodate 1024 new dwellings and the occupants would benefit from (a) one whole new community and (b) all amenities close at hand. Because – A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly, social housing, doctor surgeries, waste water etc.

The northern part of the site is close to major local employers i.e. St Peter's Hospital and Animal & Plant Health Agency. Also Woking Town Centre has many large shops needing staff etc. Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites.

**Officer Response:**

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar

amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services,

facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02157/1/001  
**Customer Name:** Rhiannon Shah

**Summary of representation:**

The proposed number of houses will severely impact the traffic in the area and destroy the woodland. The roads need to be expanded to cater for all the extra traffic, the area will become gridlocked and a health hazard.

**Officer Response:**

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;

- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is aware of the existing designated Ancient Woodland towards the northern end of the land. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees. This is highlighted in the Housing White Paper. This particular Ancient Woodland is designated on the Council Proposals Map for protection. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss. The nature and type of some of the surveys that will be required to accompany any development proposals are landscape assessment, ecological survey and tree survey. The surveys will make sure that those trees and other features of environmental and amenity significance are fully assessed and protected from development, where necessary.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

**Contributor Reference:** 02161/1/001  
**Customer Name:** Mr Brian Judson

**Summary of representation:**

Having attended meetings regarding the future development of various areas of Woking, the representation considers Martyrs Lane to be the most suitable for development. This area can feed into the A320 road and this is not prime Green Belt land as it has been previously developed for army accommodation.

**Officer Response:**

Support for Martyrs Lane is noted.

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs

Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02162/1/001  
**Customer Name:** Mr Chris Barrett

**Summary of representation:**

Support for Martyrs Lane noted as it will consolidate one development and infrastructure in one place to support the development then around Pyrford.

Opposed to any further development in Pyrford. Impact on local school which is at capacity, the roads are narrow and cannot be widened, impact on parking, shops, there is little public transport, access to the A3/M25, medical facilities are over subscribed.

**Officer Response:**

Support noted for Martyrs Lane.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The representation regarding infrastructure provision, transport, public transport and medical facilities are also already addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

**Contributor Reference:** 00552/2/001  
**Customer Name:** Mr Richard Sharp

**Summary of representation:**

Support for Martyrs Lane and opposed to building on Upshot Lane Green Belt. The addition of more houses, cars and people will place further strain on local resources such as medical, traffic, schools, all of which are at capacity. Pyrford has reached its capacity and the loss of the fields will impact the community.

**Officer Response:**

Support for Martyrs Lane and opposed to building on Upshot Lane Green Belt is noted.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Consultation Issues and Matters Topic Paper'. Infrastructure and the impact on the community have also been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

**Contributor Reference:** 02167/1/001  
**Customer Name:** Ms Clare Goodberry

**Summary of representation:**

All the sites are within Green Belt, on balance, the representation is in favour of substituting the six sites totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course because the top part of the site was recently granted planning permission and there is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc.

The northern part of the site is well served with public transport unlike the other six sites

The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre

The northern part of the site is close to major local employers like St Peter's Hospital and Animal & Plant Health Agency

Much of the northern site has already been used for non-agricultural purposes

Part of the northern site is publicly owned land so the sale would help council tax payers

Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites

**Officer Response:**

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;

- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

**Contributor Reference:** 02168/1/001  
**Customer Name:** Ms Marilyn Montclare

**Summary of representation:**

Objects to building on Martyrs Lane site due to the loss of trees, woodland, wildlife which are good for health but will increase the traffic on the roads.

Impact on local public services, such as schools and hospitals.

**Officer Response:**

The Council is aware of the existing designated Ancient Woodward towards the northern end of the land. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees. This is highlighted in the Housing White Paper. This particular Ancient Woodland is designated on the Council Proposals Map for protection. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss. The nature and type of some of the surveys that will be required to accompany any development proposals are set out in Section 9 above. The surveys will make sure that those trees and other features of environmental and amenity significance are fully assessed and protected from development, where necessary.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

In terms of infrastructure such as school and hospitals, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. . In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

**Contributor Reference:** 02172/1/001  
**Customer Name:** Ms Florence Mills

**Summary of representation:**

Support the Martyrs lane site because it can be developed as a cohesive whole development possibly including a school/health centre etc as the school in Pyrford and West Byfleet Health Centre are fully subscribed.

The location means that its land value must be lower than in Pyrford so that some affordable housing can be built on the site which could provide homes for key workers at St Peter's Hospital and other companies in the borough.

Traffic through Pyrford and West Byfleet is already congested and this site would allow direct access to Woking and the M25. Also with the planned developments at Sheer House, Broadoaks and West Hall will add to the congestion.

There would be no disruption to local communities in the 6 sites due to building works.

The land at Martyrs Lane is currently unused as an amenity and has already been used for building whereas the two fields in Pyrford are prime agricultural land giving the village a rural feel.

**Officer Response:**

Support for Martyrs Lane noted.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative. It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This site in Pyrford is not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that this particular site is of low soil quality.

In terms of amenity and character, these issues have been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', with particular reference to section 7.0 and 21.0.

**Contributor Reference:** 02173/1/001  
**Customer Name:** Mrs Caroline Mendham

**Summary of representation:**

Green Belt land should be left undeveloped and brown field sites developed instead. However, recognising the need within the borough for more housing, Martyrs Lane site is a better option than, for example, sites identified in GB10 and GB11, because McLaren were already granted permission to build on part of the New Zealand golf course, there is a presumption that the land is suitable for development.

The site is big enough (112 hectares) to accommodate 1200 house, including much needed affordable housing, and Gypsy and Traveller sites, plus the necessary infrastructure. One single large housing estate makes it easier to create that infrastructure, rather than overloading existing over stretched facilities. The planning permission process would be simplified. It would fulfil Woking's future housing and traveller needs, even if it turns out more than 1200 houses are needed.

There are a number of major employers in the area, unlike in Mayford for example.

The A320 provides easy access to the M25 as well as Woking town centre. There are existing bus and cycle routes. Development here could avoid further increasing the congestion on the A320 south of Woking.

There are no escarpment and rising ground landscape importance issues, as you have with GB 10,11 and 13. Most of the site is clear of flood 2 and flood 3 designations, thereby reducing planning and development costs.

Use of the Martyrs Lane site helps Woking meet its requirements under CS12 and CS13 and currently, provision for Gypsy and Traveller sites is located primarily in Heathlands ward, so the Martyrs Lane site gives this section of the community an opportunity to live east of Woking, with better infrastructure and gives WBC the opportunity to satisfy a target of 15 pitches and satisfy CS14.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also

confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. The land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and

still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

The justification for the release of Green Belt land for future development needs as well as the Council assessment of brownfield sites as part of the site allocation process have been fully addressed as set out in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

**Contributor Reference:** 02175/1/001  
**Customer Name:** Mr Ben Goodberry

**Summary of representation:**

All the sites are within Green Belt, on balance, the representation is in favour of substituting the six sites totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course because the top part of the site was recently granted planning permission and there is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc.

The northern part of the site is well served with public transport unlike the other six sites

The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre

The northern part of the site is close to major local employers like St Peter's Hospital and Animal & Plant Health Agency

Much of the northern site has already been used for non-agricultural purposes

Part of the northern site is publicly owned land so the sale would help council tax payers

Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites

**Officer Response:**

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;

- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding fewer residents will be impacted upon, is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02178/1/001  
**Customer Name:** Mr Mark Jones

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040 as it is in a good location.

**Officer Response:**

Support noted and it is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

**Contributor Reference:** 02180/1/001  
**Customer Name:** Mr David Stedman

### **Summary of representation:**

The representation considers the development on land to the east of Martyr's Lane is preferable to other areas surrounding Woking because:

The Martyr's Lane site is larger than all other identified sites combined a development there would provide the Council with flexibility to plan future developments beyond the current timeframe. Martyr's Lane has land for 1,200 new homes, Traveller's site plus associated infrastructure and still there may be land left over.

Economies of scale in developing the site at Martyr's Lane in preference to the six other separate sites surrounding Woking. Appropriate infrastructure could be more easily and cost-effectively built at one site rather than at a number of different sites.

All roads in and around Woking, suffer from congestion and any new development can only add to the problem. However, new homes must be built. The A320 is a key road linking Woking to the M25 to the north, and Guildford to the south. However, the A320 between Woking and the McLaren roundabout has very few buildings on the roadside and presumably could be widened without too much difficulty. Whereas the section of the A320 (Egley Road) to the south of Woking has buildings all the way out to the Mayford roundabout.

Finally, if it is decided to go ahead with development of GB7, GB10 and GB11 then Mayford will be faced with significant developments for years ahead. Mayford already have the new school and additional leisure centre. Development at Martyr's Lane appears preferable to Mayford in terms of economies of scale, ease of upgrading existing main roads and providing the Council flexibility in the future.

### **Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste

safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the

Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

**Contributor Reference:** 00529/2/001  
**Customer Name:** Mr Paul Parsons

**Summary of representation:**

Supports development here because it is brownfield rather than greenfield which is considered far more suitable for development. The Pyrford sites are greenfield sites which are actively used for walking.

The road infrastructure in this area is better, an increase in road traffic will be much less damaging to existing local residents.

**Officer Response:**

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% (excluding Martyrs Lane) of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02187/1/001  
**Customer Name:** Ms Jillian Smart

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 02189/1/001

**Customer Name:** Mr Phil Smart

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 02193/1/001  
**Customer Name:** Mrs Patricia Rochester

**Summary of representation:**

The representation is in favour of substituting the six sites with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course as part of the site was recently granted planning permission and there is currently no public access to the land. A single site would be the most convenient with regard to infrastructure. The northern part of the site is well served for public transport also the northern part is close to major local employers. The northern part has also been used for non-agricultural purposes and this northern part is publicly owned land and fewer Woking residents would be inconvenienced by this one site.

**Officer Response:**

A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day.

The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation

is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02198/1/001  
**Customer Name:** Mr Graham Woodham

**Summary of representation:**

Opposed to the development of Pyrford Fields as this will damage the local environment and stretch the infrastructure beyond its capability. Development of Pyrford Fields would severely compromise our local Green belt environment. Supports developing the alternative Martyrs Lane site, but only north of the New Zealand Golf Club. So the golf club land should be left intact but around a thousand houses plus local amenities such as a school and health centre should be built on the northern site off Martyrs Lane.

**Officer Response:**

Opposition to building on the Pyrford fields and support for Martyrs Lane is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding

policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Key issues and matters Paper. Infrastructure and amenity are also already addressed in the 'Regulation 18 Key issues and matters Paper', with particular reference to section 1.0, 3.0 and 21.0.

**Contributor Reference:** 02211/1/001

**Customer Name:** Mr John Hill

**Summary of representation:**

Any proposal for development in this area of Woking will result in a loss of the Green Belt that forms an integral part of the character of Woking, a town surrounded by large wooded areas and open common land. Objects to the development at Martyrs Lane because Canalside ward is currently under a new redevelopment scheme set to change the entire area with its overburdened infrastructure. Increasing housing density and manufacturing will affect everything from the declining public transport, overcrowded schools and our overstretched NHS services. This combined with the associated increases in road noise, lack of parking spaces, sewage, waste collections, light pollution and potential for an increased risk of flooding. The land to the east side of Martyrs Lane acts as a buffer separating Woking from Ottershaw (plus potential additional developments in this area) and New Haw thereby preventing any urban sprawl.

This important area is also home to wildlife species and flora and fauna that will be lost forever.

The roads are unable to cope with the increasing demands. The A320 and the A245 are an already a problem, practically uncrossable as a pedestrian during rush hours and dangerous for cyclists to use due to the volumes of traffic for example the six crossroads.

**Officer Response:**

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

The Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- To check the unrestricted sprawl of large build up areas;
- To prevent neighbouring towns merging into one another; and
- To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- Woking Green Belt review (2013) by Peter Brett Associates; and
- Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is

potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors. Other sections of this Issues and Matters paper address some of these other factors in detail.

Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. The land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. By releasing Green Belt land for future development, the Council also has to make sure that there is a strong defensible Green Belt boundary. The areas of the land covered by Flood Zones 2 and 3 are included within the safeguarded designation to make sure that there is a strong defensible Green Belt boundary. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core

Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this. Based on the above, it is not envisaged that the occupants of the development on the site would face unacceptable risk of flooding. Insurance of properties that could be developed on the site would not be adversely affected and the development of the site would not exacerbate flood risk elsewhere.

Officers would agree that public transport infrastructure currently serving the vicinity of the Martyrs Lane area is relatively limited. However, this would equally be true for most of the other six safeguarded sites. Access to rail stations by public transport from the various sites has already been dealt with above. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. It would therefore be necessary for the Council to work with providers to improve service provision and frequency, in particular the 592 if this site were to be safeguarded for future development. As emphasised above, bus services serving the other six safeguarded sites are also relatively limited and their development would equally require measures to improve services in these areas.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. It is acknowledged that there is an Ancient Woodland towards the northern part of the site and this will be protected as part of any development of the site if the land were to be safeguarded. The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and

tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

**Contributor Reference:** 02216/1/001  
**Customer Name:** Ms Carol Mellor

**Summary of representation:**

Opposed to Martyrs Lane site due to traffic is already very congested in that area.

**Officer Response:**

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 02214/1/001

**Customer Name:** Mr And Mrs Grahame And Linda Fleet

**Summary of representation:**

All of the seven sites under discussion are in Greenbelt, on balance, support substituting the six sites, totalling 1,024 dwellings in the draft Site Allocations DPD, with land to the east of Martyrs Lane but excluding building on the New Zealand Golf Course. The key reasons are the top part of the site was recently granted planning permission and there is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc.

The northern part of the site is well served with public transport unlike the other six sites

The northern part of the site has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre

The northern part of the site is close to major local employers like St Peter's Hospital and Animal & Plant Health Agency

Much of the northern site has already been used for non-agricultural purposes

Part of the northern site is publicly owned land so the sale would help council tax payers

Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites

**Officer Response:**

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to

enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a

development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02221/1/001  
**Customer Name:** Ms Wendy Collins

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

The representation considers, the points raised on the "NoWoodhamNewTown" website and conclude that the single Martyrs Lane site is far preferable to the scattered alternatives previously included in the draft DPD. This is not only for economies of scale but also because there are far better opportunities for improving access and connections to Martyrs Lane than for the already over-congested alternatives.

Adding more than 1000 homes anywhere within the borough will exacerbate existing congestion problems. Only the Martyrs Lane site may minimise the adverse impact as it is on the outskirts of the main population. Much of the traffic may be directed away from the centre. Infrastructure improvements and increased capacity can be realised at Martyrs Lane that would not be practicable elsewhere within more central areas. These include health care and school provisions, plus high speed broadband connections which may encourage working from home and thus reduced commuter traffic.

Further reasons to prefer the Martyrs Lane site include:

The northern part of the site is better served with public transport unlike the other six sites  
The top part of the site also includes pre-developed land used as a wartime army camp, and now semi derelict.

The northern part of Martyrs Lane site excluding the New Zealand Golf Course is sufficient to accommodate the 1,024 homes proposed in the draft Site Allocations DPD.

Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites.

**Officer Response:**

Support noted for Martyrs Lane site.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure including education, broadband and healthcare provision. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on land has been previously developed for non agricultural purposes, it is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02218/1/001  
**Customer Name:** Mr James Parker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02219/1/001

**Customer Name:** Ms Jill Morris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02223/1/001  
**Customer Name:** Ms Caroline Cackett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02224/1/001  
**Customer Name:** Mr Brett Henry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02225/1/001  
**Customer Name:** Ms Lisa French

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02229/1/001  
**Customer Name:** Mr Simon Carter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02230/1/001

**Customer Name:** Ms Julie Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02232/1/001  
**Customer Name:** Mr Darren Hayes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02234/1/001  
**Customer Name:** Ms Bianca Hards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02236/1/001  
**Customer Name:** Mr Neil Strong

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02238/1/001  
**Customer Name:** Ms Sophia Tavakoli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02243/1/001  
**Customer Name:** Mr James Tavakoli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02245/1/001

**Customer Name:** Mr John Mills

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02247/1/001  
**Customer Name:** Ms Lisa Hunnisett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02159/1/001  
**Customer Name:** Ms Debra Cohen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02170/1/001  
**Customer Name:** Ms Katie Collins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02183/1/001  
**Customer Name:** Ms Susan Holtham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02185/1/001  
**Customer Name:** Ms Louise Harper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02191/1/001  
**Customer Name:** Ms Caroline Street

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02196/1/001  
**Customer Name:** Mr Samuel Fudge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02663/1/001

**Customer Name:** Mr And Mrs N Douglas And Adrienne S Brown

**Summary of representation:**

Support the Martyrs Lane proposal excluding the New Zealand Golf Course.

Planning permission was recently granted for the top part of the site.

The top part of the site includes previously developed land and is now semi-derelict. It is not high quality green belt land.

The northern site is publicly owned land, and would assist tax payers.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues.

The site is well served by public transport.

It is close to major employers.

Would be less disruptive to residents.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02666/1/001

**Customer Name:** G S Salt

**Summary of representation:**

Supports the proposal – on land north of the golf course.

Disagrees in principle with the current policy of allocating penny pockets of development on the fringes of existing neighbourhoods in this country. Such developments are not big enough to justify additional shops, schools and transport infrastructure. They cause strain on the neighbourhoods.

Would prefer to see more comprehensive development which might cater for the whole of West Surrey for the rest of this century, containing facilities, including workplaces, which would be lacking in smaller developments.

**Officer Response:**

Support for the proposal is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The views expressed in the representation regarding wider spatial planning policy are noted. However, the Council is expected and committed to the comprehensive delivery of the requirements of the Core Strategy by allocating specific sites to bring forward their delivery, and in doing so meet the clearly stated national objective to boost significantly the supply of housing. Local authorities are responsible for establishing the right level of local housing provision in their area and identifying the long term supply of housing land to meet needs.

The Core Strategy makes provision for 4,964 net additional dwellings which will mostly be directed to previously developed land in the town, district and local centres. However, the Green Belt is identified as a broad location for the future direction of growth to meet housing need from 2022 onwards. If the council does not allocate sites in the Borough to meet these housing needs, it will not meet its national housing requirements, and it is likely that speculative development in unsustainable locations would arise.

Section 3 of the Regulation 18 consultation Issues and Matters Topic Paper sets out in detail how the Council ensures that development is supported by adequate infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The merits of a more comprehensive development as set out in the representation are noted however at this stage no strategic development sites have been identified in the West Surrey area to meet the housing needs of the area for the rest of the century. As stated above, the Council is responsible for identifying and establishing its housing need based on local evidence and for setting the planning policy framework to facilitate the delivery of housing to meet this need. The Council is also working with other authorities in the area to address common issues such as housing delivery.

**Contributor Reference:** 02231/1/001  
**Customer Name:** Mr Chan Keaney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02642/1/001  
**Customer Name:** Ms Susan Jones

**Summary of representation:**

Objects to the proposal. It is not 'safeguarding it'; it is condemning it and residents to a huge impact whilst the LDF Working Group Councillors liberate their own constituencies in the South from any burden for housing building.

It will cause urban sprawl and create a conurbation.

Already bad traffic congestion on A320 and Woodham Road will worsen from thousands more cars, which also cause air pollution (already at high levels). EU estimates cause of deaths of 10,000pa in London alone.

Adverse impact on Horsell Common SPA and Natura 2000 site and its endangered species with hundreds of cats and other pets.

Yet to assess the huge value of this deciduous forested area and its veteran trees with TPOs etc, which complements the SPA and heathlands of the famous golf course.

Golf course may be lured by WBC into selling its land, which will magnify the debt of the hugely debt-burdened Council.

Vast infrastructure will be required to service the conurbation.

A320 suffers sink holes.

The area is in a floodplain according to British Geological Survey.

Blighted by constant aeroplane noise and speeding traffic reverberating on hard-surfaced residential roads.

Cumulative impacts from Fair Oaks development – around 5,000 homes altogether.

WBC planning officers have indicated this is not suitable for development. Councillors please reassess.

**Officer Response:**

Objections are noted and will weigh in the balance of considerations by Members.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses many of the concerns raised in detail, including: the assessed impact on the Green Belt and urban sprawl; the Councillors on the LDF Working Group and the justification for the

consultation on this new site, given the change in circumstances with McLaren's planning approval and the need to assess all reasonable alternatives; traffic impacts on the A320 and Woodham Road leading to increased pollution; impacts on Horsell Common SPA and heathlands and Ancient Woodland; the need for an ecological assessment of the site to determine its green infrastructure and biodiversity value; availability of the New Zealand Golf Course and prospect that the land will be available; infrastructure provision; sink holes on the A320; flood risk of the site; cumulative impacts with nearby proposals such as that at Fair Oaks; noise pollution from aeroplanes.

In terms of cumulative traffic impacts when taking into account nearby development proposals such as that at Fair Oaks, the Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It should be noted that it is proposed that the land to the east of Martyrs Lane is used to meet housing needs between 2027 and 2040, assessed to be 1,200 homes.

**Contributor Reference:** 02637/2/001

**Customer Name:** Woodham And Horsell Neighbourhood Forum

**Summary of representation:**

1. LSE A 21st Century Metropolitan Green Belt – LSE A 21st Century Metropolitan Green Belt has done research on what types of land is most important to protect from development. This highlights over 70% of people value land with endangered wildlife, 54% value scenic land, only 40% value quality farmland and 17% value small parcels of land near other developments. This research proves that Woking Borough Council's original site allocations are far more suitable than the proposal to replace these several sites with the land east of Martyrs Lane. The report also suggests that the duty to cooperate will not produce a strategic response to the region's housing needs. The plans to develop Fair Oaks Airport and other developments in Surrey Heath and Runnymede boroughs have direct impact on Woking Borough Council's decision and further indicate that the land east of Martyrs Lane is not suitable.

2. SANGs – The current proposal includes sufficient SANGs capacity for the six sites. Horsell Common Preservation Society has indicated that more SANGs would be required given the size and close proximity of the land east of Martyrs Lane to SSSI. Natural England has clarified the purpose of SANGs and the requirements for their accessibility. Woodland or semi-wooded landscape is a key feature that people appreciate in the sites they visit, particularly those who use the SPA. This is considered to be more attractive than open landscapes or parklands with scattered trees. It is therefore hard to justify how the current proposed areas of SANGs would meet the specified standards set by Natural England. Given comments made by Rural England that visitors favour Woodland or a semi-wooded landscape, why would residents of land east of Martyrs Lane want to go to these SANGs over the SPA.

3. 2016 Air Quality Annual Status Report (ASR) – According to the Air Quality Report published by the Council, there is only one area in Knaphill that has been declared an Air Quality Management Area. However the A320 is an area of concern, and monitoring stations have been used near the site at Woodham Lane, Lincoln drive and Church. Woodham Lane already has by far higher levels of NO<sub>2</sub>. The Council has a responsibility to measure and improve air quality and any development needs to be sensitive to air quality. New houses and more cars in an already high air pollution area would increase levels of NO<sub>2</sub> whereas spreading the development over 6 sites would be far less damaging.

4. Transport hotspots – The proposals in the draft Site Allocations DPD do not present significant transport issues. However, Six Cross Roads, Martyrs Lane and Woodham Lane are all shown as major concerns if Martyrs Lane is to be developed. Police data also shows that Woodham Lane is an accident blackspot. None of the six sites will generate traffic concerns and none are accident blackspots. Only the area outside the Pyrford Primary School is highlighted as potential hotspot.

5. Schools – There is no local primary school within walking distance that kids could go to. The closest would be the Marist Catholic School which is already at capacity with no room to expand.
6. Natural Working Strategy March 2016 – The Council has failed to comply with the requirements of its own Natural Working Strategy. The Strategy states that the Council will:
  - promote high quality environment, biodiversity and sustainable development. It will take measures to protect priority wildlife species population, by reducing habitat fragmentation.The proposal contradicts the above. It would lead to the loss of woodland and would devastate habitat for many species. The other sites are all less diverse than the land east of Martyrs Lane.
7. Safeguarded plans – The land contains sites that are safeguarded for waste and mineral extraction that would be lost by the proposal. If they are not developed, there will be less development on the site than anticipated, and this would lead to more of the New Zealand Golf Course being developed. The NPPF seeks to protect minerals safeguarded sites.
8. Other development sites – There are other sites that have not been considered which they should. This includes Traditions in Pyrford and Sutton Green, where the current owners are struggling to make money and have approached the Council before about possible development.
9. The Government White Paper on housing – The Housing White Paper has made it clear that local authorities should amend Green Belt boundary only when they can demonstrate that they have examined fully all other reasonable options for meeting development requirements and where land is removed from the Green Belt, local authorities should require the impacts to be offset by compensatory improvements to the environmental quality or accessibility of the remaining Green Belt land. This suggests that the Council would need to do further evidence before removing any land from the Green Belt. So far the Council has not published any evidence of the actual needs of housing from 2027 – 2040. Given the requirements of the White Paper, the Council should stop the preparation of the Site Allocations DPD process to safeguard land for 2027 – 2040 until such time that it can clearly demonstrate a requirement.
10. Peter Brett Associates report – Residents and other Wards are quoting the Peter Brett's report as the reason why Martyrs Lane should be considered. However, the report concludes and recommends that Parcel 2 – the land east of Martyrs Lane is not recommended to be released from the Green Belt.
11. Notes of Council meetings – There have been several meetings about the proposal that highlights a lack of evidence used by councillors to justify the safeguarding of the land east of Martyrs Lane. At no point did the Council give any consideration to the cost involved in this exercise. The LDF Working Group went against the available evidence and the advice of Officers. Given that Councillor Bowes represents the Ward of Pyrford, his actions at the Working Group could be seen as Nimbyism because he presented no credible evidence to justify his proposal to include the land east of Martyrs Lane as alternative safeguarded site. The Working Group should not have been allowed to make its recommendations without

evidence. The Working Group should be held accountable for all the cost they have incurred for embarking on this exercise when they have no evidence to do so. The Working Group has misled the Council.

12. Sustainability Appraisal – The representation accepts that the sustainability appraisal is comprehensive but disagrees with some of the scoring in the report. Full details are in the representation but have been taken into account in the Officer's response.

13. Other factors – Some people have claimed that only Parcel A, the northern part of the land is required to build the required number of houses. However, the Hankinson Duckett study has concluded otherwise. Taking into account the flood risk areas, the remaining area can only be developed at a density of 68.7 dph to achieve the required number of dwellings proposed for the site.

14. Runnymede Borough Council objections – The representations by Runnymede Borough Council shows the lack of cooperation between Runnymede Borough Council and Woking Borough Council. The Council needs to cooperate with its neighbouring authorities and have a duty to care for each other and respect each others' views.

#### **Officer Response:**

1. The Council has not carried out a similar research quoted in the representation to assess the opinions of people about the value they attach to different types of land and therefore cannot endorse or disprove it. Regardless of this, the research does not prove that any of the options considered is better than the other. There is also no evidence to claim that any of the sites is habitat to endangered species. There are no absolute environmental constraints on any of the sites that would prevent their development if the Council decides on its preferred approach to safeguarding. The Council has robust policies in place to make sure that the ecological integrity on any site is not compromised as a result of development. This will be key requirement for the allocation of the site. It is important to emphasise that the Council's decision on the preferred approach to safeguarding will not rest only on the opinion of how different types of land are valued by people. The overall goal of the Council is to identify sites in sustainable locations that would contribute towards achieving sustainable development, and this should be done within the context of the overall spatial strategy for the Borough. Whilst the ecological integrity of the land will always be a material consideration, there are other factors too such as the proximity of the site to key services and facilities, availability and deliverability, risk of flooding, ability to be supported by the necessary infrastructure and many more that needs to be taken into account. The duty to cooperate is a legal duty and the Council has been cooperating with the neighbouring authorities in the preparation of the plan. The Council is satisfied that so far the requirements of the duty to cooperate are being met.

2. The Council has identified sufficient SANG capacity to meet the development needs of the Core Strategy. Horsell Common Preservation Society has made representations as a result of the consultation regarding the provision of SANGs to serve development at Martyrs Lane, and these are addressed separately. In summary, Officers believe that some of the concerns

expressed by Horsell Common Preservation Society are misplaced. The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy and the CIL Charging Schedule. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided appropriate contributions are made towards the provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the land east of Martyrs Lane or the other six sites. Officers are confident that the above requirements will be met if the Council decides to safeguard the land for future development.

It is acknowledged that the proximity of development to the SPA is an issue that needs to be taken into account in seeking to avoid harm to the SPA. However, that is not and should not be an absolute constraint to development. In fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will work in partnership with Natural England to agree appropriate measures of mitigation for any potential proposal.

Natural England has submitted representations in response to the consultation. It does not have any objection in principle to the safeguarding of the site subject to the appropriate scale of SANG being provided. Natural England notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. There are a number of examples to draw lessons. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed. The draft Site Allocations DPD proposes to allocate a number of sites for SANGs. Natural England has been consulted and they have not raised any objection in principle. The proposed SANGs would be the requirements for SANG designation. The Council does not accept that the SANG proposals in the draft Site Allocations DPD will not meet development needs and/or achieve their intended objectives.

3. There is no declared air quality management area in the vicinity of the Martyrs Lane site. The Council has robust policies to manage air quality impacts as a result of development. In

particular, Policy DM6: Air and water quality of the Development Management Policies DPD sets out strict air quality standards for development to meet. There are other policies such as policies DM5, DM7 and DM8 of the development Management Policies DPD that would apply to manage other sources of pollution as a result of development. Officers are satisfied that if the site is to be safeguarded it can be delivered without unacceptable risk to air quality.

4. The Council is fully aware of local concerns about the existing traffic conditions on various transport routes including the Woodham Lane and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate measures of mitigation to address the adverse impacts of proposed development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including potential development at Martyrs Lane.

It is too simplistic to assume that the development of the six sites will not raise significant transport issues. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios. It is important to stress that in this particular case the comparison would be between the development impacts of Martyrs Lane against the cumulative impacts of the six sites.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

A245 Woodham Lane/Sheerwater/Parvis Road;  
A320 Chertsey Road/Guildford Road; and  
B382 Old Woking Road.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. The Council is also working in partnership with Surrey Heath and Runnymede Borough Councils and the County Council to quantify the cumulative transport impacts of developments in the three authorities, including developments at Longcross and Fair Oaks if the Martyrs Lane site is safeguarded. The outcome of the study will also help determine the strategic mitigation measures that might be needed to address the cumulative impacts. The Council accepts that the safeguarding proposals would lead to an increase in traffic as demonstrated by its own studies, and mitigation will be needed to address that. It is working with the relevant bodies to determine the appropriate mitigation measures to enable the sustainable delivery of the proposals.

5. The Council will make sure that the development of any safeguarded site is supported by the necessary infrastructure including education provision. The County Council has made representation to confirm that if the Martyrs Lane site is to be developed in the future, the expectation would be that a primary school should be provided on site. If the need is proven, it will be a key requirement for the development to provide a primary school on site. In this regard, the concern raised will be fully addressed.

6. It is not envisaged that the development of the site if it is safeguarded would be contrary to the provisions of the Natural Woking Strategy. The site can be developed without compromising the nearby Thames Basin Heaths Special Protection Area. Its safeguarding would not be contrary to Policies NRM6 of the South East Plan and CS8: Thames Basin Heath Special Protection Areas of the Core Strategy if sufficient SANG capacity could be identified to support the development and a contribution is made towards Strategic Access Management and Monitoring. Any mitigation will also take into account the proximity of the site to the designated SPA. The Council can demonstrate that sufficient land will be available to support the development. The Core Strategy has robust policies to make sure that harm to the SPA as a result of development is avoided, and this will apply to any future proposal for development. Policy CS7: Biodiversity and nature conservation is sufficiently robust to protect the ecological integrity of the site. Based on the above, the Council is satisfied that the site could be developed to be in conformity with the Natural Woking Strategy. This representation has also been comprehensively addressed in the Council's response to the Woodham and Horsell Neighbourhood Forum's representations (see Woodham and Horsell Neighbourhood Forum – Issues and Matters Topic Paper).

7. The Council recognises the contribution that the community recycling centre makes towards its objective to maximise recycling in the borough. Its retention on the land as part of the master planning of the site or the provision of a new facility at an enhanced location will be made a key requirement of the allocation of the site if it is allocated. The County Council who owns the facility is supportive of this approach, and will work with the Council to agree the most effective way of retaining the facility. The owner of the land safeguarded for minerals extraction has submitted a representation as part of the Martyrs Lane consultation, and has indicated support for the site to be safeguarded to meet future housing needs of the Council. In this regard, the land could be available for future housing needs subject to further discussion with the County Council on whether or not the site will continue to be needed for their future purposes. At this stage the County Council is unsure about the future need of the site for their purposes until further assessment is undertaken as part of the emerging Surrey Waste Local Plan. Officers will continue to liaise with the County Council on this matter, and are confident that a consensus would be reached.

8. Traditions in Pyrford and Sutton Green Golf Course have not been assessed as part of this process. The land east of Martyrs Lane has been assessed because parts of it had already been assessed as part of the Regulation 18 consultation. Given the changing circumstances at the McLaren site regarding the extant planning permission that could be revoked, there is justification to assess the prospect of a comprehensive development of the entire area.

9. It is important to highlighting that the Housing White Paper does not seek to change the direction of national policy as set out in the NPPF, and neither is it an in-principle new policy. It is only intended to clarify what the existing Green Belt policies mean in practice. Woking Borough Council had always understood the interpretation of the national policy on Green Belt and is already practicing what the White Paper is proposing and as such there will be no need to carry out any further work as suggested by the representation and no purpose will be served by stopping the Site Allocations DPD process. The White Paper itself goes at length to explain that there is no change in policy regarding Green Belt. The White Paper also has suggested compensatory improvements to the environmental quality or accessibility of the remaining Green Belt when Green Belt land is released. The Council has sought further clarification on what this would be in practice in its response to the consultation on the White Paper. Even that, the Council can demonstrate that it can and is meeting this particular requirement.

The NPPF and the White Paper both offers the same strict protection to the Green Belt. The principle that once established the Green Belt boundaries should only be altered in exceptional circumstances through the review of the Local Plan has not changed. The Council has rigorously applied this principle to underpin the preparation of the Core Strategy and the Site Allocations DPD.

A key factor that has mainly been taken into account to justify exceptional circumstances for releasing Green Belt land through the plan making process has been to demonstrate that alternative options have been fully considered, including a thorough assessment of the capacity of the urban area to accommodate projected development needs. The Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review are evidence

to demonstrate the assessment of brownfield sites. Paragraph 159 of the NPPF requires Local Planning Authorities to prepare as evidence 'a strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'. Generally and specifically in Woking, SHLAAs has mainly focused on urban sites, predominantly previously developed land and how their uses can be maximised.

The Core Strategy takes this principle fully on board. In particular, Policy CS1: A spatial strategy for Woking Borough of the Core Strategy and its reasoned justification seeks to maximise the use of brownfield land. The high indicative densities set out in Policy CS10: Housing provision and distribution of the Core Strategy also reflects this principle. There are therefore clear and strong policy framework to prioritise and support development on previously developed land at high densities subject to character and environmental considerations.

Planning decisions relating to development proposals in Woking Town Centre also rigorously applies this principle. The Victoria Square and Goldsworth Road approved proposals are good examples. The Victoria Square proposal is about 660dph. The proposed indicative densities for the proposals in the draft Site Allocations DPD also seeks to maximise the efficient use of urban land. The Sheerwater scheme is a classic example of how the Council is using urban regeneration to improve living and environmental conditions of the area as suggested in the White Paper. On the basis of this, the Council has done more than the White Paper requires, and does not need to do any further work in response to the White Paper.

The NPPF is clear about the need and the reasons for safeguarding sites to ensure the enduring permanence of the Green Belt boundary beyond the plan period. It would be unreasonable within this policy context to accurately predict the exact future housing requirement. Right, the projections are based on a thorough assessment of historical data and intelligent assumptions of future provision of housing. The assumptions are credible, acknowledging that an exact housing requirement could only be determined as part of the review of the Core Strategy, an up to date evidence at the time and appropriate scrutiny at an examination. The 2027 – 2040 housing provision of 1,200 dwellings is on the basis that the Council will continue to provide 292 dwellings per year.

For the 13 year period, this is estimated to be 3,796 dwellings. It is assumed that lower density development in the Green Belt of about 30dph will continue into the future. An intelligent assumption has been made that the urban area will continue to make a significant contribution towards housing supply during that period in line with the overall spatial strategy. The estimated projection is that the urban area will provide about 50% of the total supply of housing during that period. A marginal allowance has been made for windfall development, which will continue to come forward during that time. Historical estimates over 10 years suggest that about 40 dwellings per year will be delivered through this source. On the basis of the above the figure of 1,200 specified in the consultation document for which land is sought is a reasonable and realistic expectation of what would be accommodated on the safeguarded site(s).

10. The Council is aware that the Peter Brett's report did not recommend that Parcel 2 be released from the Green Belt. This is a material consideration that the Council will take into account when considering the representations to the consultation.

11. The Council is transparent about the conduct of its meetings and has published the Officers' advice on the safeguarding of the land east of Martyrs Lane. Both Officers and Members agreed that the consultation on the land east of Martyrs Lane was necessary and the representations that are received during the consultation will be source of relevant information to inform the subsequent stages of the Site Allocations DPD process. Whilst it is clear that the LDF Working Group did not accept the entire recommendations of Officers, it is clear from the Minutes of the meetings that they carefully considered the report before reaching their recommendations. The Working Group also had all the necessary evidence before them to inform their recommendations. Appropriate procedure is followed in this regard. The Council has not yet made any decision on the Officers report or the recommendations of the Working Group. It has rightly reserved its right and authority to do so after careful consideration of the representations received during the Martyrs Lane consultation. The request for further consultation was appropriate and justified to aid informed decision making. The Working Group is set up to scrutinise Officers reports and to make recommendations to the Council or other relevant decision making committees of the Council. The task and the action that the Working Group took regarding its recommendations on Martyrs Lane are therefore in line with its responsibilities. The Working Group provided reasons for their recommendations. Council as a decision making body is yet to make its decision before consulting on the Publication version of the Site Allocations DPD (Regulation 19). Councillor Bowes has also been transparent about his proposed amendment at the Working Group. There is nothing improper about his conduct in this regard. He provided clear reasons for his amendment and it will be up to the Council to judge whether or not the recommendations of the Working Group are rational. The fact Councillor Bowes is a Ward Councillor in a ward that Green Belt sites are proposed to be released should not be a reason to prevent him from participating in discussions about the Site Allocations DPD in an open and transparent manner, in particular, as the Working Group is only a scrutiny and an advisory group.

12. It is noted that the representation has come to different conclusions on some of the scorings in the sustainability appraisal. It is reasonable to expect that this could happen. The Council has used consistent and clear assumptions to inform the scoring and are satisfied of the scores.

13. The geographical extent of the land east of Martyrs Lane is defined by a Map and it includes the golf course. The Council had not specified which parts of the land will be used for what purpose. This is a decision that will broadly be informed by the representations to the consultation and in detail through a potential masterplanning of the land if it is safeguarded. The consultation document was also clear that the land should be capable of delivering at least 1,200 homes. This is necessary to justify it as an alternative to the six sites it seeks to replace. The Hankinson Duckett report has recommended that the development of Parcel A (north of the land) will lead to an isolated development in the Green Belt. The Council will take the information into account to inform its final decisions.

14. Runnymede Borough Council has made a separate representation regarding the duty to cooperate, which has been fully addressed. Officers strongly disagree with their assertion that the Council has not met its requirements for the duty to cooperate by not consulting Runnymede and the neighbouring authorities prior to the consultation. The claim is factually incorrect. The Council resolved to consult on the possibility of substituting the land east of Martyrs Lane for the six original safeguarded sites at its meeting on 20 October 2016. Runnymede Borough Council and the other neighbouring authorities were notified of the Council's decision soon after that on 24 October 2016. The Council had not previously considered this matter. The proposal was referred to Council for consideration by the LDF Working Group and the 20 October 2016 meeting was the first time the Council had considered the matter.

Runnymede Borough Council was once again invited on 28 October 2016 to send the Council any informal representations they may have and for them to be taken into account before the proposal was formally published for consultation. They were also offered an opportunity to meet to discuss the details of the proposal and the nature of the consultation. The Council met them to do so. The consultation started on 6 January 2017 for a period of six weeks, and they were formally consulted. The Council is satisfied that it has gone beyond the requirements of the duty to cooperate to reach out to the neighbouring authorities and to listen to any concerns they may have, and it is not correct to suggest that Runnymede was not adequately consulted. The Council understands that the duty to cooperate is a continuous process and has subsequently been engaging with Runnymede and Surrey Heath Borough Councils after the consultation period to establish a framework for joint working in the future. The above clearly demonstrates that the Council has positively engaged with Runnymede regarding this particular issue.

**Contributor Reference:** 00041/3/001  
**Customer Name:** Mr Matthew Ryder

**Summary of representation:**

1 LSE A 21st Century Metropolitan Green Belt – LSE A 21st Century Metropolitan Green Belt has done research on what types of land is most important to protect from development. This highlights over 70% of people value land with endangered wildlife, 54% value scenic land, only 40% value quality farmland and 17% value small parcels of land near other developments. This research proves that Woking Borough Council's original site allocations are far more suitable than the proposal to replace these several sites with the land east of Martyrs Lane. The report also suggests that the duty to cooperate will not produce a strategic response to the region's housing needs. The plans to develop Fair Oaks Airport and other developments in Surrey Heath and Runnymede boroughs have direct impact on Woking Borough Council's decision and further indicate that the land east of Martyrs Lane is not suitable.

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**Officer Response:**

1 The Council has not carried out a similar research quoted in the representation to assess the opinions of people about the value they attach to different types of land and therefore cannot endorse or disprove it. Regardless of this, the research does not prove that any of the options considered is better than the other. There is also no evidence to claim that any of the sites is habitat to endangered species. There are no absolute environmental constraints on any of the sites that would prevent their development if the Council decides on its preferred approach to safeguarding. The Council has robust policies in place to make sure that the ecological integrity on any site is not compromised as a result of development. This will be key requirement for the allocation of the site. It is important to emphasise that the Council's decision on the preferred approach to safeguarding will not rest only on the opinion of how different types of land are valued by people. The overall goal of the Council is to identify sites in sustainable locations that would contribute towards achieving sustainable development, and this should be done within the context of the overall spatial strategy for the Borough. Whilst the ecological integrity of the land will always be a material consideration, there are other factors too such as the proximity of the site to key services and facilities, availability and deliverability, risk of flooding, ability to be supported by the necessary infrastructure and many more that needs to be taken into account. The duty to cooperate is a legal duty and the Council has been cooperating with the neighbouring authorities in the preparation of the plan. The Council is satisfied that so far the requirements of the duty to cooperate are being met.

2 The Council has identified sufficient SANG capacity to meet the development needs of the Core Strategy. Horsell Common Preservation Society has made representations as a result of the consultation regarding the provision of SANGs to serve development at Martyrs Lane, and these are addressed separately. In summary, Officers believe that some of the concerns expressed by Horsell Common Preservation Society are misplaced. The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy and the CIL Charging Schedule. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided appropriate contributions are made towards the

provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the land east of Martyrs Lane or the other six sites. Officers are confident that the above requirements will be met if the Council decides to safeguard the land for future development.

It is acknowledged that the proximity of development to the SPA is an issue that needs to be taken into account in seeking to avoid harm to the SPA. However, that is not and should not be an absolute constraint to development. In fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will work in partnership with Natural England to agree appropriate measures of mitigation for any potential proposal.

Natural England has submitted representations in response to the consultation. It does not have any objection in principle to the safeguarding of the site subject to the appropriate scale of SANG being provided. Natural England notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. There are a number of examples to draw lessons. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed. The draft Site Allocations DPD proposes to allocate a number of sites for SANGs. Natural England has been consulted and they have not raised any objection in principle. The proposed SANGs would be the requirements for SANG designation. The Council does not accept that the SANG proposals in the draft Site Allocations DPD will not meet development needs and/or achieve their intended objectives.

3 There is no declared air quality management area in the vicinity of the Martyrs Lane site. The Council has robust policies to manage air quality impacts as a result of development. In particular, Policy DM6: Air and water quality of the Development Management Policies DPD sets out strict air quality standards for development to meet. There are other policies such as policies DM5, DM7 and DM8 of the development Management Policies DPD that would apply to manage other sources of pollution as a result of development. Officers are satisfied that if the site is to be safeguarded it can be delivered without unacceptable risk to air quality.

4 The Council is fully aware of local concerns about the existing traffic conditions on various transport routes including the Woodham Lane and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generate by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate measures of mitigation to address the adverse impacts of proposed development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);

- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including potential development at Martyrs Lane.

It is too simplistic to assume that the development of the six sites will not raise significant transport issues. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios. It is important to stress that in this particular case the comparison would be between the development impacts of Martyrs Lane against the cumulative impacts of the six sites.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

A245 Woodham Lane/Sheerwater/Parvis Road;  
A320 Chertsey Road/Guildford Road; and  
B382 Old Woking Road.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. The Council is also working in partnership with Surrey Heath and Runnymede Borough Councils and the County Council to quantify the cumulative transport impacts of developments in the three authorities, including developments at Longcross and Fair Oaks if the Martyrs Lane site is safeguarded. The outcome of the study will also help

determine the strategic mitigation measures that might be needed to address the cumulative impacts. The Council accepts that the safeguarding proposals would lead to increase in traffic as demonstrated by its own studies, and mitigation will be needed to address that. It is working with the relevant bodies to determine the appropriate mitigation measures to enable the sustainable delivery of the proposals.

5 The Council will make sure that the development of any safeguarded site is supported by the necessary infrastructure including education provision. The County Council has made representation to confirm that if the Martyrs Lane site is to be developed in the future, the expectation would be that a primary school should be provided on site. If the need is proven, it will be a key requirement for the development to provide a primary school on site. In this regard, the concern raised will fully addressed.

6 It is not envisaged that the development of the site if it is safeguarded would be contrary to the provisions of the Natural Woking Strategy. The site can be developed without compromising the nearby Thames Basin Heaths Special Protection Area. Its safeguarding would not be contrary to Policies NRM6 of the South East Plan and CS8: Thames Basin Heath Special Protection Areas of the Core Strategy if sufficient SANG capacity could be identified to support the development and a contribution is made towards Strategic Access Management and Monitoring. Any mitigation will also take into account the proximity of the site to the designated SPA. The Council can demonstrate that sufficient land will be available to support the development. The Core Strategy has robust policies to make sure that harm to the SPA as a result of development is avoided, and this will apply to any future proposal for development. Policy CS7: Biodiversity and nature conservation is sufficiently robust to protect the ecological integrity of the site. Based on the above, the Council is satisfied that the site could be developed to be in conformity with the Natural Woking Strategy. This representation has also been comprehensively addressed in the Council's response to the Woodham and Horsell Neighbourhood Forum's representations (see Woodham and Horsell Neighbourhood Forum – Issues and Matters Topic Paper).

7 The Council recognises the contribution that the community recycling centre makes towards its objective to maximise recycling in the borough. Its retention on the land as part of the master planning of the site or the provision of a new facility at an enhanced location will be made a key requirement of the allocation of the site if it is allocated. The County Council who owns the facility is supportive of this approach, and will work with the Council to agree the most effective way of retaining the facility. The owner of the land safeguarded for minerals extraction has submitted a representation as part of the Martyrs Lane consultation, and has indicated support for the site to be safeguarded to meet future housing needs of the Council. In this regard, the land could be available for future housing needs subject to further discussion with the County Council on whether or not the site will continue to be needed for their future purposes. At this stage the County Council is unsure about the future need of the site for their purposes until further assessment is undertaken as part of the emerging Surrey Waste Local Plan. Officers will continue to liaise with the County Council on this matter, and are confident that a consensus would be reached.

8 Traditions in Pyrford and Sutton Green Golf Course have not been assessed as part of this process. The land east of Martyrs Lane has been assessed because parts of it had already been assessed as part of the Regulation 18 consultation. Given the changing circumstances at the McLaren site regarding the extant planning permission that could be revoked, there is justification to assess the prospect of a comprehensive development of the entire area.

9 It is important to highlighting that the Housing White Paper does not seek to change the direction of national policy as set out in the NPPF, and neither is it an in-principle new policy. It is only intended to clarify what the existing Green Belt policies mean in practice. Woking Borough Council had always understood the interpretation of the national policy on Green Belt and is already practicing what the White Paper is proposing and as such there will be no need to carry out any further work as suggested by the representation and no purpose will be served by stopping the Site Allocations DPD process. The White Paper itself goes at length to explain that there is no change in policy regarding Green Belt. The White Paper also has suggested compensatory improvements to the environmental quality or accessibility of the remaining Green Belt when Green Belt land is released. The Council has sought further clarification on what this would be in practice in its response to the consultation on the White Paper. Even that, the Council can demonstrate that it can and is meeting this particular requirement.

The NPPF and the White Paper both offers the same strict protection to the Green Belt. The principle that once established the Green Belt boundaries should only be altered in exceptional circumstances through the review of the Local Plan has not changed. The Council has rigorously applied this principle to underpin the preparation of the Core Strategy and the Site Allocations DPD.

A key factor that has mainly been taken into account to justify exceptional circumstances for releasing Green Belt land through the plan making process has been to demonstrate that alternative options have been fully considered, including a thorough assessment of the capacity of the urban area to accommodate projected development needs. The Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review are evidence to demonstrate the assessment of brownfield sites. Paragraph 159 of the NPPF requires Local Planning Authorities to prepare as evidence 'a strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'. Generally and specifically in Woking, SHLAAs has mainly focused on urban sites, predominantly previously developed land and how their uses can be maximised.

The Core Strategy takes this principle fully on board. In particular, Policy CS1: A spatial strategy for Woking Borough of the Core Strategy and its reasoned justification seeks to maximise the use of brownfield land. The high indicative densities set out in Policy CS10: Housing provision and distribution of the Core Strategy also reflects this principle. There are therefore clear and strong policy framework to prioritise and support development on previously developed land at high densities subject to character and environmental considerations.

Planning decisions relating to development proposals in Woking Town Centre also rigorously applies this principle. The Victoria Square and Goldsworth Road approved proposals are good examples. The Victoria Square proposal is about 660dph. The proposed indicative densities for the proposals in the draft Site Allocations DPD also seeks to maximise the efficient use of urban land. The Sheerwater scheme is a classic example of how the Council is using urban regeneration to improve living and environmental conditions of the area as suggested in the White Paper. On the basis of this, the Council has done more than the White Paper requires, and does not need to do any further work in response to the White Paper.

The NPPF is clear about the need and the reasons for safeguarding sites to ensure the enduring permanence of the Green Belt boundary beyond the plan period. It would be unreasonable within this policy context to accurately predict the exact future housing requirement. Right, the projections are based on a thorough assessment of historical data and intelligent assumptions of future provision of housing. The assumptions are credible, acknowledging that an exact housing requirement could only be determined as part of the review of the Core Strategy, an up to date evidence at the time and appropriate scrutiny at an examination. The 2027 – 2040 housing provision of 1,200 dwellings is on the basis that the Council will continue to provide 292 dwellings per year.

For the 13 year period, this is estimated to be 3,796 dwellings. It is assumed that lower density development in the Green Belt of about 30dph will continue into the future. An intelligent assumption has been made that the urban area will continue to make a significant contribution towards housing supply during that period in line with the overall spatial strategy. The estimated projection is that the urban area will provide about 50% of the total supply of housing during that period. A marginal allowance has been made for windfall development, which will continue to come forward during that time. Historical estimates over 10 years suggest that about 40 dwellings per year will be delivered through this source. On the basis of the above the figure of 1,200 specified in the consultation document for which land is sought is a reasonable and realistic expectation of what would be accommodated on the safeguarded site(s).

10 The Council is aware that the Peter Brett's report did not recommend that Parcel 2 be released from the Green Belt. This is a material consideration that the Council will take into account when considering the representations to the consultation.

11 The Council is transparent about the conduct of its meetings and has published the Officers' advice on the safeguarding of the land east of Martyrs Lane. Both Officers and Members agreed that the consultation on the land east of Martyrs Lane was necessary and the representations that are received during the consultation will be source of relevant information to inform the subsequent stages of the Site Allocations DPD process. Whilst it is clear that the LDF Working Group did not accept the entire recommendations of Officers, it is clear from the Minutes of the meetings that they carefully considered the report before reaching their recommendations. The Working Group also had all the necessary evidence before them to inform their recommendations. Appropriate procedure is followed in this regard. The Council has not yet made any decision on the Officers report or the recommendations of the Working

Group. It has rightly reserved its right and authority to do so after careful consideration of the representations received during the Martyrs Lane consultation. The request for further consultation was appropriate and justified to aid informed decision making. The Working Group is set up to scrutinise Officers reports and to make recommendations to the Council or other relevant decision making committees of the Council. The task and the action that the Working Group took regarding its recommendations on Martyrs Lane are therefore in line with its responsibilities. The Working Group provided reasons for their recommendations. Council as a decision making body is yet to make its decision before consulting on the Publication version of the Site Allocations DPD (Regulation 19). Councillor Bowes has also been transparent about his proposed amendment at the Working Group. There is nothing improper about his conduct in this regard. He provided clear reasons for his amendment and it will be up to the Council to judge whether or not the recommendations of the Working Group are rational. The fact Councillor Bowes is a Ward Councillor in a ward that Green Belt sites are proposed to be released should not be a reason to prevent him from participating in discussions about the Site Allocations DPD in an open and transparent manner, in particular, as the Working Group is only a scrutiny and an advisory group.

12 It is noted that the representation has come to different conclusions on some of the scorings in the sustainability appraisal. It is reasonable to expect that this could happen. The Council has used consistent and clear assumptions to inform the scoring and are satisfied of the scores.

13 The geographical extent of the land east of Martyrs Lane is defined by a Map and it includes the golf course. The Council had not specified which parts of the land will be used for what purpose. This is a decision that will broadly be informed by the representations to the consultation and in detail through a potential masterplanning of the land if it is safeguarded. The consultation document was also clear that the land should be capable of delivering at least 1,200 homes. This is necessary to justify it as an alternative to the six sites it seeks to replace. The Hankinson Duckett report has recommended that the development of Parcel A (north of the land) will lead to an isolated development in the Green Belt. The Council will take the information into account to inform its final decisions.

14 Runnymede Borough Council has made a separate representation regarding the duty to cooperate, which has been fully addressed. Officers strongly disagree with their assertion that the Council has not met its requirements for the duty to cooperate by not consulting Runnymede and the neighbouring authorities prior to the consultation. The claim is factually incorrect. The Council resolved to consult on the possibility of substituting the land east of Martyrs Lane for the six original safeguarded sites at its meeting on 20 October 2016. Runnymede Borough Council and the other neighbouring authorities were notified of the Council's decision soon after that on 24 October 2016. The Council had not previously considered this matter. The proposal was referred to Council for consideration by the LDF Working Group and the 20 October 2016 meeting was the first time the Council had considered the matter.

Runnymede Borough Council was once again invited on 28 October 2016 to send the Council any informal representations they may have and for them to be taken into account before the proposal was formally published for consultation. They were also offered an opportunity to meet to discuss the details of the proposal and the nature of the consultation. The Council met them to do so. The consultation started on 6 January 2017 for a period of six weeks, and they were formally consulted. The Council is satisfied that it has gone beyond the requirements of the duty to cooperate to reach out to the neighbouring authorities and to listen to any concerns they may have, and it is not correct to suggest that Runnymede was not adequately consulted. The Council understands that the duty to cooperate is a continuous process and has subsequently been engaging with Runnymede and Surrey Heath Borough Councils after the consultation period to establish a framework for joint working in the future. The above clearly demonstrates that the Council has positively engaged with Runnymede regarding this particular issue.

**Contributor Reference:** 02147/2/001

**Customer Name:** Ms Jo Ryder

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1 The Council has not carried out a similar research quoted in the representation to assess the opinions of people about the value they attach to different types of land and therefore cannot endorse or disprove it. Regardless of this, the research does not prove that any of the options considered is better than the other. There is also no evidence to claim that any of the sites is habitat to endangered species. There are no absolute environmental constraints on any of the sites that would prevent their development if the Council decides on its preferred approach to safeguarding. The Council has robust policies in place to make sure that the ecological integrity on any site is not compromised as a result of development. This will be key requirement for the allocation of the site. It is important to emphasise that the Council's decision on the preferred approach to safeguarding will not rest only on the opinion of how different types of land are valued by people. The overall goal of the Council is to identify sites in sustainable locations that would contribute towards achieving sustainable development, and this should be done within the context of the overall spatial strategy for the Borough. Whilst the ecological integrity of the land will always be a material consideration, there are other factors too such as the proximity of the site to key services and facilities, availability and deliverability, risk of flooding, ability to be supported by the necessary infrastructure and many more that needs to be taken into account. The duty to cooperate is a legal duty and the Council has been cooperating with the neighbouring authorities in the preparation of the plan. The Council is satisfied that so far the requirements of the duty to cooperate are being met.

2 The Council has identified sufficient SANG capacity to meet the development needs of the Core Strategy. Horsell Common Preservation Society has made representations as a result of the consultation regarding the provision of SANGs to serve development at Martyrs Lane, and

these are addressed separately. In summary, Officers believe that some of the concerns expressed by Horsell Common Preservation Society are misplaced. The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy and the CIL Charging Schedule. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided appropriate contributions are made towards the provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the land east of Martyrs Lane or the other six sites. Officers are confident that the above requirements will be met if the Council decides to safeguard the land for future development.

It is acknowledged that the proximity of development to the SPA is an issue that needs to be taken into account in seeking to avoid harm to the SPA. However, that is not and should not be an absolute constraint to development. In fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will work in partnership with Natural England to agree appropriate measures of mitigation for any potential proposal.

Natural England has submitted representations in response to the consultation. It does not have any objection in principle to the safeguarding of the site subject to the appropriate scale of SANG being provided. Natural England notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. There are a number of examples to draw lessons. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed. The draft Site Allocations DPD proposes to allocate a number of sites for SANGs. Natural England has been consulted and they have not raised any objection in principle. The proposed SANGs would be the requirements for SANG designation. The Council does not accept that the SANG proposals in the draft Site Allocations DPD will not meet development needs and/or achieve their intended objectives.

3 There is no declared air quality management area in the vicinity of the Martyrs Lane site. The Council has robust policies to manage air quality impacts as a result of development. In particular, Policy DM6: Air and water quality of the Development Management Policies DPD sets out strict air quality standards for development to meet. There are other policies such as policies DM5, DM7 and DM8 of the development Management Policies DPD that would apply to manage other sources of pollution as a result of development. Officers are satisfied that if the site is to be safeguarded it can be delivered without unacceptable risk to air quality.

4 The Council is fully aware of local concerns about the existing traffic conditions on various transport routes including the Woodham Lane and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate measures of mitigation to address the adverse impacts of proposed development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including potential development at Martyrs Lane.

It is too simplistic to assume that the development of the six sites will not raise significant transport issues. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios. It is important to stress that in this particular case the comparison would be between the development impacts of Martyrs Lane against the cumulative impacts of the six sites.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

A245 Woodham Lane/Sheerwater/Parvis Road;  
A320 Chertsey Road/Guildford Road; and  
B382 Old Woking Road.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. The Council is also working in partnership with Surrey Heath and Runnymede Borough Councils and the County Council to quantify the cumulative transport impacts of developments in the three authorities, including developments at Longcross and Fair Oaks if the Martyrs Lane site is safeguarded. The outcome of the study will also help determine the strategic mitigation measures that might be needed to address the cumulative impacts. The Council accepts that the safeguarding proposals would lead to an increase in traffic as demonstrated by its own studies, and mitigation will be needed to address that. It is working with the relevant bodies to determine the appropriate mitigation measures to enable the sustainable delivery of the proposals.

5 The Council will make sure that the development of any safeguarded site is supported by the necessary infrastructure including education provision. The County Council has made representation to confirm that if the Martyrs Lane site is to be developed in the future, the expectation would be that a primary school should be provided on site. If the need is proven, it will be a key requirement for the development to provide a primary school on site. In this regard, the concern raised will be fully addressed.

6 It is not envisaged that the development of the site if it is safeguarded would be contrary to the provisions of the Natural Woking Strategy. The site can be developed without compromising the nearby Thames Basin Heaths Special Protection Area. Its safeguarding would not be contrary to Policies NRM6 of the South East Plan and CS8: Thames Basin Heath Special Protection Areas of the Core Strategy if sufficient SANG capacity could be identified to support the development and a contribution is made towards Strategic Access Management and Monitoring. Any mitigation will also take into account the proximity of the site to the designated SPA. The Council can demonstrate that sufficient land will be available to support the development. The Core Strategy has robust policies to make sure that harm to the SPA as a result of development is avoided, and this will apply to any future proposal for development. Policy CS7: Biodiversity and nature conservation is sufficiently robust to protect the ecological integrity of the site. Based on the above, the Council is satisfied that the site could be developed to be in conformity with the Natural Woking Strategy. This representation has also been comprehensively addressed in the Council's response to the Woodham and Horsell Neighbourhood Forum's representations (see Woodham and Horsell Neighbourhood Forum – Issues and Matters Topic Paper).

7 The Council recognises the contribution that the community recycling centre makes towards its objective to maximise recycling in the borough. Its retention on the land as part of the master planning of the site or the provision of a new facility at an enhanced location will be made a key requirement of the allocation of the site if it is allocated. The County Council who owns the facility is supportive of this approach, and will work with the Council to agree the most effective way of retaining the facility. The owner of the land safeguarded for minerals extraction has submitted a representation as part of the Martyrs Lane consultation, and has indicated support for the site to be safeguarded to meet future housing needs of the Council. In this regard, the land could be available for future housing needs subject to further discussion with the County Council on whether or not the site will continue to be needed for their future purposes. At this stage the County Council is unsure about the future need of the site for their purposes until further assessment is undertaken as part of the emerging Surrey Waste Local Plan. Officers will continue to liaise with the County Council on this matter, and are confident that a consensus would be reached.

8 Traditions in Pyrford and Sutton Green Golf Course have not been assessed as part of this process. The land east of Martyrs Lane has been assessed because parts of it had already been assessed as part of the Regulation 18 consultation. Given the changing circumstances at the McLaren site regarding the extant planning permission that could be revoked, there is justification to assess the prospect of a comprehensive development of the entire area.

9 It is important to highlighting that the Housing White Paper does not seek to change the direction of national policy as set out in the NPPF, and neither is it an in-principle new policy. It is only intended to clarify what the existing Green Belt policies mean in practice. Woking Borough Council had always understood the interpretation of the national policy on Green Belt and is already practicing what the White Paper is proposing and as such there will be no need to carry out any further work as suggested by the representation and no purpose will be served by stopping the Site Allocations DPD process. The White Paper itself goes at length to explain that there is no change in policy regarding Green Belt. The White Paper also has suggested compensatory improvements to the environmental quality or accessibility of the remaining Green Belt when Green Belt land is released. The Council has sought further clarification on what this would be in practice in its response to the consultation on the White Paper. Even that, the Council can demonstrate that it can and is meeting this particular requirement.

The NPPF and the White Paper both offers the same strict protection to the Green Belt. The principle that once established the Green Belt boundaries should only be altered in exceptional circumstances through the review of the Local Plan has not changed. The Council has rigorously applied this principle to underpin the preparation of the Core Strategy and the Site Allocations DPD.

A key factor that has mainly been taken into account to justify exceptional circumstances for releasing Green Belt land through the plan making process has been to demonstrate that alternative options have been fully considered, including a thorough assessment of the capacity of the urban area to accommodate projected development needs. The Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review are evidence

to demonstrate the assessment of brownfield sites. Paragraph 159 of the NPPF requires Local Planning Authorities to prepare as evidence 'a strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'. Generally and specifically in Woking, SHLAAs has mainly focused on urban sites, predominantly previously developed land and how their uses can be maximised.

The Core Strategy takes this principle fully on board. In particular, Policy CS1: A spatial strategy for Woking Borough of the Core Strategy and its reasoned justification seeks to maximise the use of brownfield land. The high indicative densities set out in Policy CS10: Housing provision and distribution of the Core Strategy also reflects this principle. There are therefore clear and strong policy framework to prioritise and support development on previously developed land at high densities subject to character and environmental considerations.

Planning decisions relating to development proposals in Woking Town Centre also rigorously applies this principle. The Victoria Square and Goldsworth Road approved proposals are good examples. The Victoria Square proposal is about 660dph. The proposed indicative densities for the proposals in the draft Site Allocations DPD also seeks to maximise the efficient use of urban land. The Sheerwater scheme is a classic example of how the Council is using urban regeneration to improve living and environmental conditions of the area as suggested in the White Paper. On the basis of this, the Council has done more than the White Paper requires, and does not need to do any further work in response to the White Paper.

The NPPF is clear about the need and the reasons for safeguarding sites to ensure the enduring permanence of the Green Belt boundary beyond the plan period. It would be unreasonable within this policy context to accurately predict the exact future housing requirement. Right, the projections are based on a thorough assessment of historical data and intelligent assumptions of future provision of housing. The assumptions are credible, acknowledging that an exact housing requirement could only be determined as part of the review of the Core Strategy, an up to date evidence at the time and appropriate scrutiny at an examination. The 2027 – 2040 housing provision of 1,200 dwellings is on the basis that the Council will continue to provide 292 dwellings per year.

For the 13 year period, this is estimated to be 3,796 dwellings. It is assumed that lower density development in the Green Belt of about 30dph will continue into the future. An intelligent assumption has been made that the urban area will continue to make a significant contribution towards housing supply during that period in line with the overall spatial strategy. The estimated projection is that the urban area will provide about 50% of the total supply of housing during that period. A marginal allowance has been made for windfall development, which will continue to come forward during that time. Historical estimates over 10 years suggest that about 40 dwellings per year will be delivered through this source. On the basis of the above the figure of 1,200 specified in the consultation document for which land is sought is a reasonable and realistic expectation of what would be accommodated on the safeguarded site(s).

10 The Council is aware that the Peter Brett's report did not recommend that Parcel 2 be released from the Green Belt. This is a material consideration that the Council will take into account when considering the representations to the consultation.

11 The Council is transparent about the conduct of its meetings and has published the Officers' advice on the safeguarding of the land east of Martyrs Lane. Both Officers and Members agreed that the consultation on the land east of Martyrs Lane was necessary and the representations that are received during the consultation will be source of relevant information to inform the subsequent stages of the Site Allocations DPD process. Whilst it is clear that the LDF Working Group did not accept the entire recommendations of Officers, it is clear from the Minutes of the meetings that they carefully considered the report before reaching their recommendations. The Working Group also had all the necessary evidence before them to inform their recommendations. Appropriate procedure is followed in this regard. The Council has not yet made any decision on the Officers report or the recommendations of the Working Group. It has rightly reserved its right and authority to do so after careful consideration of the representations received during the Martyrs Lane consultation. The request for further consultation was appropriate and justified to aid informed decision making. The Working Group is set up to scrutinise Officers reports and to make recommendations to the Council or other relevant decision making committees of the Council. The task and the action that the Working Group took regarding its recommendations on Martyrs Lane are therefore in line with its responsibilities. The Working Group provided reasons for their recommendations. Council as a decision making body is yet to make its decision before consulting on the Publication version of the Site Allocations DPD (Regulation 19). Councillor Bowes has also been transparent about his proposed amendment at the Working Group. There is nothing improper about his conduct in this regard. He provided clear reasons for his amendment and it will be up to the Council to judge whether or not the recommendations of the Working Group are rational. The fact Councillor Bowes is a Ward Councillor in a ward that Green Belt sites are proposed to be released should not be a reason to prevent him from participating in discussions about the Site Allocations DPD in an open and transparent manner, in particular, as the Working Group is only a scrutiny and an advisory group.

12 It is noted that the representation has come to different conclusions on some of the scorings in the sustainability appraisal. It is reasonable to expect that this could happen. The Council has used consistent and clear assumptions to inform the scoring and are satisfied of the scores.

13 The geographical extent of the land east of Martyrs Lane is defined by a Map and it includes the golf course. The Council had not specified which parts of the land will be used for what purpose. This is a decision that will broadly be informed by the representations to the consultation and in detail through a potential masterplanning of the land if it is safeguarded. The consultation document was also clear that the land should be capable of delivering at least 1,200 homes. This is necessary to justify it as an alternative to the six sites it seeks to replace. The Hankinson Duckett report has recommended that the development of Parcel A (north of the land) will lead to an isolated development in the Green Belt. The Council will take the information into account to inform its final decisions.

14 Runnymede Borough Council has made a separate representation regarding the duty to cooperate, which has been fully addressed. Officers strongly disagree with their assertion that the Council has not met its requirements for the duty to cooperate by not consulting Runnymede and the neighbouring authorities prior to the consultation. The claim is factually incorrect. The Council resolved to consult on the possibility of substituting the land east of Martyrs Lane for the six original safeguarded sites at its meeting on 20 October 2016. Runnymede Borough Council and the other neighbouring authorities were notified of the Council's decision soon after that on 24 October 2016. The Council had not previously considered this matter. The proposal was referred to Council for consideration by the LDF Working Group and the 20 October 2016 meeting was the first time the Council had considered the matter.

Runnymede Borough Council was once again invited on 28 October 2016 to send the Council any informal representations they may have and for them to be taken into account before the proposal was formally published for consultation. They were also offered an opportunity to meet to discuss the details of the proposal and the nature of the consultation. The Council met them to do so. The consultation started on 6 January 2017 for a period of six weeks, and they were formally consulted. The Council is satisfied that it has gone beyond the requirements of the duty to cooperate to reach out to the neighbouring authorities and to listen to any concerns they may have, and it is not correct to suggest that Runnymede was not adequately consulted. The Council understands that the duty to cooperate is a continuous process and has subsequently been engaging with Runnymede and Surrey Heath Borough Councils after the consultation period to establish a framework for joint working in the future. The above clearly demonstrates that the Council has positively engaged with Runnymede regarding this particular issue.

**Contributor Reference:** 02657/1/001  
**Customer Name:** Mrs Molly Brown

**Summary of representation:**

Development in Pyrford would be a blot on the landscape.

The road infrastructure in the area would not cope with the additional traffic and result in congestion. The road is already dangerous by the school.

Martyrs Lane as a single site is a better option and would not inflict any more traffic through Byfleet and keep the local environment a safe place to live and enjoy.

**Officer Response:**

Support for the Martyrs Lane proposal and objection to development in Pyrford is noted.

The representation regarding the landscape impact of development as well as the provision of road infrastructure has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular Section 3.0 and 7.0.

In addition, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A245 corridor between Woodham Lane, Sheerwater and Parvis Road in addition to the A320 and B382 (Old Woking Road).

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

Regardless of the Council's preferred safeguarding option, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 02197/1/001  
**Customer Name:** Ms Marion McAllister

**Summary of representation:**

Object to development on Green Belt in Pyrford.

Object to the principle of Green Belt development. If there is an aging population then the Green Belt should be enlarged nor reduced.

There should be more creative ideas rather than building houses on farmland. There should be far more incentive to utilise the rent a room scheme, by making it up to £15k tax free.

**Officer Response:**

The Council notes the objection to development on Green Belt land in Pyrford.

The representation regarding the principle of development, as well as the need to safeguard land for future development needs, has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular Sections 1.0 and 2.0.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites, including the possible land to the east of Martyrs Lane, are classified as high quality agricultural land by DEFRA.

Whilst the Council notes the representation regarding the rent a room scheme, it should be noted that this is not a planning matter. In addition it is not considered that such a scheme will meet the housing demand of the borough, which is clearly set out in the Topic Paper noted above as well as in the Strategic Housing Market Assessment. Whilst this type of scheme may provide some short term accommodation, it will also not provide the housing type and mix required in the borough, including family accommodation, specialist residential accommodation and affordable housing.

**Contributor Reference:** 02202/1/001  
**Customer Name:** Ms Sarah Zone

**Summary of representation:**

Traffic is already appalling and further development will make the situation worse. The schools, doctors and dentists are also at capacity. Where will the new residents go? Without infrastructure provision the whole area will be adversely affected.

**Officer Response:**

The Council has addressed the representations relating to infrastructure provision and traffic in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02205/1/001  
**Customer Name:** Mr Brian Shreeve

**Summary of representation:**

Support for the Martyrs Lane proposal.

Only the northern half of the Martyr's Lane site would be required to satisfy the requirements to deliver the 1024 homes and no building would be required on New Zealand Golf Club land.

The site is already partly developed and somewhat derelict unlike the Pyrford sites which have been farmed for many years and still provides cereal crops.

There are no known footpaths on the Martyrs Lane land and the site is better connected to Woking town centre and to major commuter routes via the M25 than the Pyrford sites.

The Green Belt boundary review considered the Pyrford sites to be of major environmental constraint, whereas the Martyr's Lane land was considered to be of minor environmental constraint. Therefore the Martyrs Lane land should be chosen in preference to that in Pyrford for the new housing development.

Affordable housing could be provided for staff at the local major employers.

The Pyrford school is at capacity and the Martyrs Land site could include a new school.

Access to the site could be secured at the McLaren Roundabout on the A320.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste

safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the

amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02207/1/001  
**Customer Name:** Ms Belinda Barrett

**Summary of representation:**

Strongly support the Martyrs Lane proposal. It would allow the required infrastructure to be developed accordingly such as a school and health centre. The A320 could be widened to the M25 to support additional traffic and to provide public transport between St Peters Hospital, Chertsey and Woking town centre. It may also be possible to divert the railway to include a station between Woking and West Byfleet.

Object to development in Pyrford. The school is at capacity and additional development would require an additional school. The roads in Pyrford are narrow and congested at peak times and they can not be widened. They are also dangerous.

There is a lack of parking in the village for the school and a lack of public transport.

Access to the A3 and M25 is heavily utilised from all directions. Medical facilities in West Byfleet are also at capacity.

If more housing is needed then it makes sense to create a purpose built village or town and plan for the services that are needed to support it rather than trying to fit them in retrospectively.

**Officer Response:**

Support for the Martyrs Lane site and objection to development in Pyrford is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Regarding the suggestion of re-routing the railway line and the provision of a new station to serve the development, the Council has not previously identified this significant infrastructure project in the Infrastructure Delivery Plan (IDP). Nevertheless the Council will bring the suggestion to the attention of Network Rail for their consideration.

The representation outlining reasons against development in Pyrford, including matters on traffic and congestion, infrastructure provision and public transport have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02210/1/001  
**Customer Name:** Mr Jon Blundell

**Summary of representation:**

The land to the east of Martyrs Lane is important Green Belt land and should not be developed. Once built on it would be lost for future generations.

**Officer Response:**

The Council has addressed the representation regarding the important contribution the site makes in terms of Green Belt purposes in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02213/1/001  
**Customer Name:** Mr David Rousham

**Summary of representation:**

Objects to development on Green Belt land in Pyrford. The infrastructure in terms of transport and education provision are already at capacity and development would make the situation worse. This area is an outstanding area of natural beauty housing much wildlife.

The Martyrs Lane site excluding the New Zealand Golf Course is brownfield and has the capacity to develop its own infrastructure to support development. This is a more sensible approach. Support this proposal.

**Officer Response:**

Objection to development in Pyrford and support for the Martyrs Lane proposal is noted.

The representation regarding reasons to not develop in Pyrford, including infrastructure provision, impact on wildlife and landscape have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using

its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 00358/2/001  
**Customer Name:** Ms Katey Grant

**Summary of representation:**

Support the proposed allocation of Martyrs Lane despite it being Green Belt land.

The proposal should include 1,024 dwellings but exclude building on the New Zealand Golf Course.

The key reasons are:-

The top part of the site was recently granted planning permission.

There is currently no public access to the land.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues that will arise from building more homes – more affordable homes, schools possibly social housing, doctor surgeries, traffic volumes, waste water etc.

The northern part of the site is well served with public transport unlike the other six sites and has access on to the A320 via a roundabout with its direct road links to M25 and to Woking town centre

The northern part of the site is close to major local employers

Much of the northern site has already been used for non-agricultural purposes

Part of the northern site is publicly owned land so the sale would help council tax payers

Fewer residents of Woking would be impacted with one site in the northern part than by six individual sites.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

Regarding the need to release Green Belt land for development needs, this has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Section 1.0 and 2.0.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst the representation notes that the New Zealand Golf Course should be retained, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient

land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not used for agricultural purposes, the same can be said for the majority of the six original sites proposed to be safeguarded. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02192/1/001  
**Customer Name:** Mr Colin Cross

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

Object to the two Pyrford sites being included in the consultation.

The impact of development in Pyrford along with development in other nearby areas such as Ripley will add to the existing issue of congestion.

Development will also add to the current excessive strain on all roads in the area, schools, trains and health services.

The fields play a critical role in protecting the Green Belt and the rural character and landscape will be totally changed if they are developed.

**Officer Response:**

Support for the Martyrs Lane site and objection to the safeguarding of Green Belt land in Pyrford is noted.

The representation highlighting reasons against development in Pyrford, namely traffic and congestion, the purposes of Green Belt, the impact on landscape and character as well as the provision of infrastructure has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

These matters will weigh in the balance of considerations by Members.

**Contributor Reference:** 02195/1/001  
**Customer Name:** Ms Alison Jones

**Summary of representation:**

Objects to the Martyrs Lane proposal on the basis of loss of green belt land, flood risk, pressure on transport, lack of public transport, too much stress of current infrastructure as well as the loss of woodland and wildlife.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

Regarding the representation relating to the loss of Green Belt land, in the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs has already been established in the Core Strategy and is consistent with national policy. This has been addressed in further detail in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Section 1.0 and 2.0.

The representation regarding flood risk, transport and public transport as well as wider infrastructure provision has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. The representation regarding the loss of woodland and wildlife is also addressed in this paper.

**Contributor Reference:** 02208/1/001  
**Customer Name:** Mr Roy Butcher

**Summary of representation:**

Support for the Martyrs Lane proposal.

Martyrs Lane offers economies of scale, resulting in lower planning permission, infrastructure and build costs. This in turn will result in lower house prices enabling the objective of affordable housing. It will also be more economical to provide services and facilities such as shops, recreational areas, social and health facilities. It would be possible to build a community within the development.

The site offers vastly better transport links by both public and private transport. The other six sites are in locations where the road network is at capacity. Development in West Byfleet will only add to this congestion. They also have limited bus services. Martyrs Lane has a daily bus service plus a cycle track. There is also local access to the M25.

There are three major employers within walking distance of Martyrs Lane.

Whilst the site is within the Green Belt, it is not pristine land with any heritage or wildlife value.

Understand that there are willing landowners who will sell for development purposes and that some of the land is owned by Surrey County Council. Therefore there are no purchasing problems. New Zealand Golf Course would not be affected by any development.

The Green Belt sites in Pyrford have significant value in terms of location, recreation, heritage and wildlife. They are virgin Green Belt and developing on them will reduce the barrier between existing properties and the countryside. This will lead to urban sprawl. A public enquiry during the 1980s confirmed that these fields should not be released for development. Given the number of new dwellings which are required, there is no justification in removing valuable quality green belt from the enjoyment of the population.

**Officer Response:**

Support for the Martyrs Lane proposal and objection to development in Pyrford is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of a significant number of new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of

this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of

development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Regarding the representation on the landscape quality of the Martyrs Lane site, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on wildlife, the land is not covered by any absolute environmental constraints and any development constraints on the site will be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be identified and protected.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes grass verges and the Martyrs Lane Recycling Centre.

The representation outlining reasons against development in Pyrford have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. Specifically the representation referring to road infrastructure, recreation and well-being, heritage, wildlife and urban sprawl.

Whilst historically these two sites may have not been allocated for development, the Council is fully committed to the comprehensive delivery of the Core Strategy. It is also preparing the Site Allocations DPD in accordance with national planning policy. In order to deliver the Core Strategy and plan for long term development needs, the Council has prepared a number of evidence base documents to inform its Site Allocations DPD. This includes the Green Belt boundary review, the Landscape Character Assessment, the Strategic Highway Assessment and a Sustainability Appraisal which assessed about 125 sites in total. These evidence base documents are on the Council's website. The purpose of the Martyrs Lane consultation is to ensure that the Council identifies the most sustainable sites when compared against all other reasonable alternatives and that this decision is based on robust evidence.

**Contributor Reference:** 02215/1/001  
**Customer Name:** Ms Leticia Lopez De Blundell

**Summary of representation:**

It is important green belt land that will be lost forever.

**Officer Response:**

The Council accepts that any land taken out of the Green belt will lead to a reduction of the amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has to ensure that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green belt land proposed to be released for development up to 2040 is about 3.5%. The amount of land being proposed to be released is therefore relatively modest.

**Contributor Reference:** 02217/1/001  
**Customer Name:** Ms Francesca Gaskin

**Summary of representation:**

Objects to development in Pyrford and supports proposals for Martyrs Lane.

The land in Martyrs Lane has limited public access and much less historical importance than the land in Pyrford where the footpaths and scenic countryside are frequently used.

The Green Belt boundary review stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt.

The land in the Martyrs lane proposal has been previously built on and land was recently approved for McLaren to build a factory on the site. Land is also currently owned by Surrey County Council.

The Martyrs Lane development would be located on a single site which is less costly and far less disruptive than developing 6 separate sites across the Borough.

A single site will enable infrastructure to be built into the development without the problems associated with implementing services across six separate sites.

**Officer Response:**

Support for the Martyrs Lane proposal and objection to development in Pyrford is noted.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by heritage constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst some of the land within the site is publicly owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. Land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The representation regarding the landscape quality of the fields in Pyrford has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02220/1/001  
**Customer Name:** Ms Zoe Williams

**Summary of representation:**

The proposal will result in the loss of green belt land and cause considerable traffic problems on a road out of Woking that is already at capacity. This will be to the detriment of the environment.

**Officer Response:**

In the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established in the Core Strategy and is consistent with national planning policy. This is set out in further detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The purpose of the Martyrs Lane consultation is to inform the Council's decision on its preferred safeguarding strategy and that the sites selected for safeguarding will not undermine the purpose and integrity of the Green Belt.

The environmental implications of any of the sites identified for development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

**Contributor Reference:** 02226/1/001

**Customer Name:** Bryn Lewis

**Summary of representation:**

The proposal does not make provision for any infrastructure such as education and healthcare provision. There is no joined up approach to the impact of development on infrastructure.

It only suggests that people could drive to places nearby.

If these issues can be addressed then the site could be suitable.

**Officer Response:**

The representation regarding the provision of infrastructure and the promotion of car travel has been addressed by the Council in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 00543/3/001  
**Customer Name:** Mr Peter Graves

**Summary of representation:**

Concerned that the Martyrs Lane site was held back from the Regulation 18 consultation and that the Council is unable to explain why this is the case.

Land in Pyrford has been designated as unsuitable for release from the Green Belt.

Martyrs Lane is suitable as the top part of the site has recently been granted planning permission, there is no public right of access to the site, a single site would provide some economies of scale towards infrastructure provision and affordable housing, it has access to the A320 at a roundabout and onto the M25 and Woking town centre, it is in close proximity to major employers and is used for non-agricultural purposes.

The northern part of the site is in public ownership and the sale of the land would benefit Council Tax payers.

Fewer residents will be impacted with one site than the six original sites.

Green Belt in Pyrford should be protected.

**Officer Response:**

Parcels of land within the Martyrs Lane site that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

In addition, at the time the Regulation 18 version of the draft Site Allocations DPD was published, the McLaren planning permission had not been revoked and it was considered likely that the scheme would be implemented. It would therefore have been unreasonable for the Council to allocate the site for future residential development when there was a recent and live planning consent for employment uses on the land. Taking this and the assessment carried out

as part of the Sustainability Appraisal into account, it is incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked as part of the preparation of the Site Allocations DPD.

It should be noted that the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after considering all the development and environmental constraints within the borough. Detailed analysis and reasons for this recommendation are set out in the report.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Whilst it is correct that the site is not currently used for agricultural purposes, this can also be said for the majority of the original six sites identified in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. Most of the public owned land includes the Martyrs Lane Recycling Centre and grass verges.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02186/1/001  
**Customer Name:** Mr Ian Marchant

**Summary of representation:**

Object to the Martyrs land proposal on the basis of;  
It would result in the loss of a large area of green belt land  
Increased flood risk in this low area  
Pressure on transport and a lack of public transport  
Loss of woodland and wildlife.  
Development would place too much stress on existing infrastructure. Local facilities are never improved/expanded when large developments like this are approved.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The Council accepts that any land taken out of the Green Belt will lead to a reduction of the amount of Green Belt land in the borough. Whilst the Council sympathises with this concern, the overriding consideration is that any land release from the Green Belt is the most sustainable when compared against other reasonable alternatives and that it will not undermine the overall purpose and integrity of the Green Belt. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about 3.5% of the total area of the Green Belt. The amount of land being proposed to be released is therefore relatively modest.

The other issues raised in the representation have been addressed by the Council in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 00865/2/001  
**Customer Name:** Mr Matt Martin

**Summary of representation:**

The local area is unable to cope with extra population from an infrastructure perspective. Commuter transport from Woking to London is also at capacity.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 02160/1/001

**Customer Name:** Mr Guy Grant

**Summary of representation:**

Supports the Martyrs Lane proposal and that the Pyrford sites should be protected.

One larger site of 1024 dwellings would provide economies of scale, making it easier and cheaper to resolve infrastructure provision when compared against six sites spread across the borough.

Fewer residents would be impacted by traffic disruption.

Land values of northern sites are much less than the 6 original sites suggested and this facilitate the provision of Affordable Housing. Housing in Pyrford is expensive and more executive homes will not provide key worker dwellings needed.

There are three large employers close by the Martyrs Lane site. St Peters Hospital needs affordable housing for its workers and there is a bus that connects the hospital to the site.

Current plans for development in West Byfleet means that the Pyrford/West Byfleet area has more than enough development taking place already.

Surrey County Council studies show that 900 dwellings at Martyrs Lane will have less impact on traffic conditions than the development proposals in Mayford or the combination of developments proposed for Byfleet and Pyrford. Martyrs Lane would alleviate congestion in West Byfleet from traffic emanating from the 6 separate sites across Woking.

The Martyrs Lane site has the benefit of main road links to Woking, Chertsey and the M25. Roads in Byfleet and Pyrford are only B or C roads. The traffic flow on the A245 through West Byfleet is at capacity.

The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to the A320.

West Byfleet Health Centre and Pyrford school are at capacity and the Martyrs Lane site offers the opportunity to develop new facilities.

Martyr's lane already has better bus services than other sites.

Please vote in favour of the Martyrs Lane site.

## Officer Response:

Support for the Martyrs Lane site for future development needs and objection to development in Pyrford is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst it is agreed that the site is of a significant size, it should be noted that as part of the consultation exercise, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport

Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 02165/1/001  
**Customer Name:** Mr Terry Chubb

**Summary of representation:**

Any Green Belt land developed on will be lost forever. The urban sprawl over Middlesex is an example of how important the Green Belt is to the environment and to the inheritance to future generations.

Recognize the need for more affordable housing in the borough. Green Belt is preferred by developers due to the lower development costs. Would it be possible to stipulate that greenfield sites can only be developed for affordable housing, such as small two bedroom houses with outdoor and recreation space. Brownfield sites can then be used for more expensive housing to justify the higher development costs.

Under the current proposals the Byfleets, Pyrford and Mayford seem to be taking most of the new development. This should be shared across the borough. The current allocations may well influence future council elections.

Whilst it may not be a legally valid reason for objecting, the impact of development on infrastructure such as schools and traffic will make the situation worse and will effect the response of the people who respond to the consultation.

**Officer Response:**

As set out in Section 21.0 of the Regulation 18 consultation Issues and Matters Topic Paper, the Council accepts that any land taken out of the Green Belt will lead to a reduction of the amount of Green Belt land and the benefits it brings to the local community. The Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established in the Core Strategy and is consistent with national planning policy.

The overriding objective of the Martyrs Lane consultation is to inform the Council's decision on its preferred safeguarding strategy to ensure that the most sustainable sites are identified when compared against all other reasonable alternatives.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Core Strategy and Development Management Policies DPD also contain policies to ensure that adequate private outdoor amenity space is provided for residential development. This is also set out in detail in the Outlook, Amenity, Privacy and Outlook SPD. The Core Strategy in particular also contains policy requirements for the provision of outdoor communal play areas. These matters would be considered in detail at the Development Management stage.

Regarding the representation relating to the location of development, it should be noted that the draft Site Allocations DPD includes over 70 sites across the borough for development. The majority of these sites are located within the existing centres of Woking and West Byfleet as these are the most sustainable locations within the borough. As part of this work the Council had comprehensively assessed about 125 sites before it published the draft document in 2015. The Site Allocations DPD has also been informed by evidence base documents including the Green Belt boundary review, Landscape Character Assessment and Strategic Transport Assessments. Based on the Council's evidence, the proposed sites are the most sustainable when compared to all other reasonable alternatives.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02181/1/001

**Customer Name:** Jo Clayton

**Summary of representation:**

Support for the Martyrs Lane proposal.

Developing one site makes more sense as it is previously developed rather than being a green field site. It would also allow for the provision of infrastructure to be put in place.

It would minimise disruption to the borough, offer economies of scale and be better connected to the town centre and the M25.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02145/1/001  
**Customer Name:** Ms Alexandra Kenney

**Summary of representation:**

One large development will have a significant negative impact on the local environment as well as lead to the loss of Green Belt. It will also put pressure on transport and local infrastructure which is already at capacity.

Development will result in urban sprawl and the loss of wildlife. This is a terrible proposal and will have too much of a negative impact.

**Officer Response:**

Objection to the proposal is noted.

The principle of Green Belt development, including safeguarding land for future development needs, has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular Section 1.0 and 2.0.

The representation regarding the impact of development on the Green Belt at Martyrs Lane and the urban sprawl which could result from the development of the site, has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. The representation relating to traffic and congestion as well as woodland has also been addressed in this paper.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the

development of the site and indeed for the development of any of the other proposed six safeguarded sites. However, it has always been very clear to the Council that infrastructure funding has never been and cannot be met entirely by developer contributions. Public sector contributions have and will always be a significant part of infrastructure funding, and the Council works tirelessly with relevant agencies to secure public sector and other sources of funding for infrastructure projects. For example, the CIL Charging Schedule identifies the priority infrastructure to support the delivery of the Core Strategy, how much it will cost, how much of the funding will met from developer contributions and how much is expected to be secured from public sector sources. This gives an indication of the scale of public sector funding expected to help deliver the identified infrastructure.

Regarding the representation on wildlife it should be noted that the land is not covered by any absolute environmental constraints. The development constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

Whilst the representation is not supportive of the consultation proposal, the overriding objective of the consultation is to obtain information and evidence from consultees, stakeholders and the wider public to inform the Council's decision on its preferred safeguarding strategy. As part of this decision making process, the Council has to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

**Contributor Reference:** 02146/1/001  
**Customer Name:** Mr Ronald Brandman

**Summary of representation:**

The land to the east of Martyrs Lane is preferred over the six original sites. Note that the earlier sites were never adopted by the Council due to considerable public opposition and a very flawed process.

The Martyrs Lane site is close to major employers. It is roughly midway between West Byfleet Station and Woking Station and also has excellent access to the M25 on good roads.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is factually correct that the previous sites set out in the draft Site Allocations DPD were never adopted by the Council. The Council is currently in the process of preparing its Site Allocations DPD. The original proposed sites were set out in the Regulation 18 version of the document which is one of the initial formal stages of the plan making process. The purpose of this consultation is to inform the Council's decision on its preferred safeguarding option for the Regulation 19 consultation and subsequent examination.

The Council does not consider the Regulation 18 consultation to have been flawed as suggested in the representation and believes it has complied with both its Statement of Community Involvement (SCI) as well as the Town and Country Planning (Local Planning) (England) Regulations 2012. This has been addressed in further detail in Section 6.0 of the Regulation 18 consultation Issues and Matters Topic Paper.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor between Woking and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Whilst the site could result in the an efficient use of land when compared to the other sites, the overriding consideration for the Council is to identify the most sustainable location for future development when compared against all other reasonable alternatives.

Regarding the representation on defensible Green Belt boundaries, it should be noted that the Green Belt boundary review assessed this site and concluded that the removal of any part of the land would result in an area of development unconnected to the urban area and is therefore not recommended for removal from the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

**Contributor Reference:** 02149/1/001  
**Customer Name:** Ms Angela Jones

**Summary of representation:**

Object to development in Saunders Lane, Mayford. There is enough Brownfield land in the borough to meet the housing needs until at least 2040 without using any of the Green Belt.

Understand that there was significant objection to the Regulation 18 consultation for development in Mayford. Objections submitted at this stage still apply now.

Understand that the Council is consulting on Martyrs Lane on the basis that it would be substituted for the other six sites for development between 2027 and 2040.

Protect Mayford and its Green Belt from development.

Regarding Martyrs Lane:

The site is big enough (112 hectares) to accommodate 1,200 houses, including affordable housing, one or more Gypsy and Traveller sites, and the necessary infrastructure of shops, primary schools, health centre development.

There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones.

It is close to the development at Sheerwater where much of the design and infrastructure work has already taken place.

It will simplify the process for obtaining planning permission which would be good value for money and a more efficient use of public funds.

There are major employers close by. A new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the north, and to Woking Town Centre and the mainline railway station to the South. Bus routes and cycle routes exist already. There is little development along the A320 North of Woking, making road widening relatively easy if necessary. The A320 in south Woking is already at capacity.

It has no other National or Local landscape designation unlike some of the other proposals.

Most of the Martyrs Lane site is clear of Flood 2 and Flood 3 designations which should make the planning and development process simpler and more cost effective.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Master planning of the total residential development would allow for the provision of Affordable Housing which the Council is not currently meeting. It would also allow for Specialist Residential Accommodation.

Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking as all existing sites are in south Woking. The site would satisfy the requirements of CS14 and result in Ten Acre Farm being removed from the Site Allocations DPD.

Because of the size of the Martyrs Lane area – it is almost twice the size as the six sites it might replace – it should be possible to build all the properties necessary to fulfil Woking's future Housing and Traveller needs, even if it subsequently turns out that more than 1,200 houses are needed, or if there is a further requirement post 2040.

A decision to build in Martyrs Lane site makes sense in terms of the redevelopment of Sheerwater. The Sheerwater development should produce a huge positive impact on the local area and further development in the close proximity will have cost efficient benefits also.

Development in Mayford would result in the destruction of wildlife, natural heath land and Green Belt that provides the 'lungs' for Woking.

It would also increase traffic, pollution and associated risk factors which are not acceptable.

#### **Officer Response:**

Objection to development in Mayford and support for the Martyrs Lane site is noted.

In the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs has already been established and is consistent with national planning policy. This is based on the Council's evidence base that was used to inform the Core Strategy. This is been addressed further in the Regulation 18 consultation Issues and Matters Topic Paper.

It is correct that the Council received a significant number of representations to the Regulation 18 consultation. It should be noted that the representations received commented on the majority of the 75 sites proposed in the draft Site Allocations DPD and did not just refer to the proposed sites in Mayford.

The purpose of the Land to the east of Martyrs Lane consultation is to inform the Council's decision on its preferred safeguarding option. All of the representations received from this current consultation will be considered by the Council in making its decision.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It should be noted that the land to the east of Martyrs Lane is not developer led unlike the other six sites identified in the draft Site Allocations DPD. Therefore should the Council decide to safeguard Martyrs Lane for future development needs, it may be required to facilitate the delivery of the site by using its Compulsory Purchase Powers, as set out above.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the

determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The representation regarding reasons against development in Mayford have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular, the representation relating to wildlife, environmental constraints, traffic and congestion. Regarding the representation on air pollution, the environmental implications of development at any of the allocated sites will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

**Contributor Reference:** 02128/1/001  
**Customer Name:** Mr Alan Grant

**Summary of representation:**

Supports the Martyrs Lane proposal and that the Pyrford sites should be protected.

One larger site of 1024 dwellings would provide economies of scale, making it easier and cheaper to resolve infrastructure provision when compared against six sites spread across the borough.

Fewer residents would be impacted by traffic disruption.

Land values of northern sites are much less than the 6 original sites suggested and this facilitate the provision of Affordable Housing. Housing in Pyrford is expensive and more executive homes will not provide key worker dwellings needed.

There are three large employers close by the Martyrs Lane site. St Peters Hospital needs affordable housing for its workers and there is a bus that connects the hospital to the site.

Current plans for development in West Byfleet means that the Pyrford/West Byfleet area has more than enough development taking place already.

Surrey County Council studies show that 900 dwellings at Martyrs Lane will have less impact on traffic conditions than the development proposals in Mayford or the combination of developments proposed for Byfleet and Pyrford. Martyrs Lane would alleviate congestion in West Byfleet from traffic emanating from the 6 separate sites across Woking.

The Martyrs Lane site has the benefit of main road links to Woking, Chertsey and the M25. Roads in Byfleet and Pyrford are only B or C roads. The traffic flow on the A245 through West Byfleet is at capacity.

The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to the A320.

West Byfleet Health Centre and Pyrford school are at capacity and the Martyrs Lane site offers the opportunity to develop new facilities.

Martyr's lane already has better bus services than other sites.

Please vote in favour of the Martyrs Lane site.

## Officer Response:

Support for the Martyrs Lane site for future development needs and objection to development in Pyrford is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst it is agreed that the site is of a significant size, it should be noted that as part of the consultation exercise, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport

Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 02132/1/001

**Customer Name:** National Grid

**Summary of representation:**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.

**Officer Response:**

The Council notes that National Grid has no comments to make in response to this consultation.

As set out in the Council's Statement of Community Involvement, the Council will consult with the relevant infrastructure providers, including National Grid, during both the plan making and development management processes. The Council welcomes the opportunity to engage with National Grid as part of the Site Allocations DPD process in the future.

**Contributor Reference:** 02126/1/001  
**Customer Name:** Mr Gerald Griffiths

**Summary of representation:**

Given the shortage of supply of new homes the Council's responsibility to meet long term housing needs, it is a good thing that the Martyrs Lane site has been identified for residential development.

The scale of development provides a golden opportunity to produce a development along the lines of a Garden Village complete with infrastructure including education and healthcare provision, pubs and a village hall.

The site is located between Woking Town Centre and the M25 and have good access to the A320 and A245. The widening of the A320 through Ottershaw will be required to cope with the increased traffic from the Fair Oaks proposal.

If developed with a vision and sensitivity, it would allow young people to get on the housing ladder by means of affordable housing. Please do not entertain the idea of high rise and high density development at this site. This will only increase pressure on the overload borough infrastructure.

There are technical matters relating to the consultation that are of concern. The Green Belt boundary review, prepared by Peter Brett Associates, was used for the Regulation 18 consultation. The review did not recommend the Martyrs Lane site for development. This raises the question why it did not and why only now has the Martyrs Lane site come up for consultation. Was the review flawed for not promoting the site or was the brief for the report limited to play down the promotion of the site.

Secondly the consultation document refers to 'safeguarded sites' and the substitution of the Martyrs Lane site for these safeguarded sites. Not aware that there are safeguarded sites as no formal process has taken place. As of today, the draft Site Allocations is only based on the Green Belt boundary review. Questions why the Council has attributed a status to land recommended for development in the Green Belt boundary review which that land does not have.

Recommends that when the results of the Martyrs Lane consultation are published, that the Council clarifies that the reference to safeguarded land was a mistake and that the draft Site Allocations DPD will be amended accordingly.

**Officer Response:**

Support for the Martyrs Lane site to meet future development needs is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Although the site area is of a significant size, as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The representation referring to the principles of Garden Villages is noted. At this stage of the Site Allocations DPD process the Council is in the process of informing its decision on its preferred safeguarding option. The merits of the site as a Garden Village as set out in the representation will weigh in the balance of considerations by Members.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council is aware of the potential developments at Fair Oaks in Surrey Heath as well as Longcross in Runnymede, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's viability assessments residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has clear policies in place to ensure that future development is of a high standard and reflects local character. In addition, Core Strategy Policy CS1 and CS2 state that Woking Town Centre may be suitable for tall buildings and high density development. This is based on the sustainable location of the town centre. Policy CS10: Housing provision and distribution states that in the Green Belt, an indicative housing density range of 30 to 50 dwellings per hectare would be suitable. This policy would apply to either the Martyrs Lane site or any of the original sites identified in the draft Site Allocations DPD. The exact density and scale of development will be considered in greater detail at the development management stage.

It is correct that the Green Belt boundary review did not recommend the land to the east of Martyrs Lane for development. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. In addition to the Green Belt boundary review the Council has comprehensively assessed parcels of land within the Martyrs Lane site as part of the Sustainability Appraisal work it has undertaken. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the Green Belt boundary review is flawed.

The Council is satisfied that the brief for the Green Belt boundary review was not limited, as suggested in the representation. The review has provided the Council with a robust evidence base to inform its emerging Site Allocations DPD. In addition, the Council has also undertaken a comprehensive Sustainability Assessment which has assessed about 125 sites across the Borough. This matter has been addressed in further detail in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Sections 8.0, 9.0 and 10.0.

The preparation of the Site Allocations DPD is the formal process that will ultimately confirm the status of each of the sites designated within it, including those that are earmarked for safeguarding. The sites that have been identified in the Regulation 18 version are those that the Council had proposed for the purposes of safeguarding if it is examined and approved. The Land to the east of Martyrs Lane Consultation Document is careful to use the term 'proposed sites' and the introduction to the draft Site Allocations DPD also makes it clear that the sites are proposed at this stage.

The Council published the draft Site Allocations DPD for public consultation between 18th June and 31st July 2015. The publication of the draft document was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document clearly identified a number of sites that would be safeguarded for future development needs between 2027 and 2040. To clarify, the draft Site Allocations DPD safeguarded the following sites for future development needs:

- GB4: Land south of High Road, Byfleet
- GB5: Land to the south of Murray's Lane, Byfleet
- GB9: Woking Garden Centre, Egley Road, Mayford
- GB10: Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford
- GB11: Land to the north west of Saunders Lane, Mayford
- GB12: Land rear of 79–95 Lovelace Drive, Teggs Lane, Pyrford
- GB13: Land east of Upshot Lane and south of Aviary Road, Pyrford

As well as clearly identifying specific sites for safeguarding, Paragraph 216 of the National Planning Policy Framework (NPPF) states that at this stage of the process, the document can be afforded very limited weight in the determination of planning applications. Therefore despite

not being an adopted Council document, it does form part of the Development Plan for Woking Borough.

Based on the above, whilst the Site Allocations DPD has not been adopted by the Council at this stage it is clear that the formal plan making process has started and that the Martyrs Lane consultation document was correct in identifying the original sites as 'safeguarded sites in the draft Site Allocations DPD'.

It should be noted that the Regulation 18 version of the Site Allocations DPD is based on a wide range of evidence base documents and not entirely on the Green Belt boundary review prepared by Peter Brett Associates. As set out in Section 8.0 of the Regulation 18 consultation Issues and Matters Topic Paper, the Council has used a number of evidence base documents to inform the Site Allocations DPD. Since the publication of the draft Site Allocations DPD, the Council has also published a number of other evidence base documents including additional transport and landscape studies. Further details can be found on the Council's website as well as within the Land to the east of Martyrs Lane Consultation Document.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will be considered during the review of the Core Strategy and/or Site Allocation DPD. At this particular stage, the Council is only seeking to identify specific sites for safeguarding that are capable of delivering the borough's future development needs.

**Contributor Reference:** 02129/2/001  
**Customer Name:** Mr Roger Pashley

**Summary of representation:**

Objects to the proposal.

The land should remain as Green Belt as it acts as a buffer between the urban sprawl or Woking and the village of Ottershaw.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 02171/1/001  
**Customer Name:** Mr Colin Parnell

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 02137/1/001  
**Customer Name:** Lesley Masters

**Summary of representation:**

Writing to state views on the proposed development of the fields in Pyrford. Have lived in Pyrford for a number of years and seen many changes and the development of houses.

Pyrford has grown extensively. Local schools are being expanded, whilst healthcare facilities can not cope with demand. The roads are congested as well as those in West Byfleet.

There will be very little open green space left for the community comprising a rising elderly population and young growing families. There is no space to accommodate further schools, shops and medical facilities. Additional development will put further strain on these services.

Martyrs Lane makes more sense as there is more land for housing with better access to main roads. There is also space for infrastructure such as education and healthcare facilities.

Pyrford can not sustain families comfortably and the reasons above set out why Martyrs Lane is the better option.

**Officer Response:**

The reasons for not developing the two sites in Pyrford, as set out in the representation, have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. This includes the representation on traffic and congestion, infrastructure provision and the loss of open space.

Support for the Martyrs Lane site is noted.

Whilst it is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes, cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary

infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02142/1/001  
**Customer Name:** Mr Simon Grout

**Summary of representation:**

Strong views that Martyrs Lane is the best option when compared against the other alternatives. Pyrford is inappropriate for development based on the following reasons.

The Pyrford sites have been farmed for centuries and are in keeping with the rural character of the area. This is highlighted in the Pyrford Neighbourhood Plan. Pyrford sites are a contributing asset used for agriculture whereas the Martyrs Lane site has no current use at all.

Understands that the site was granted planning permission for a factory, which was revoked at the request of the applicant. The case officer considered the impact on the Green Belt and assessed that building at a large scale on the site presented no risk of merger and sprawl.

The northern part of the site can deliver 1024 homes as required by the Regulation 18 Site Allocations DPD. The housing numbers being used by the No Woodham New Town Group is completely without foundation.

There is enough land to the north of the New Zealand Golf Course for it to be retained.

The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford.

The Brett report considered Pyrford land to be in category Major Environmental Constraint. The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character. Concludes that the Brett Report supports the suitability of Martyrs Lane for development on all counts.

The Martyrs Lane site is previously developed land.

The site would offer economies of scale making it easier to deal with infrastructure provision. The site can deliver affordable housing, whilst Pyrford is expensive and executive housing will not benefit those employed by St Peters Hospital. A bus connects the site to the hospital.

Surrey County Council reports state that the Martyrs Lane development will have less impact on traffic conditions than the development proposed for Mayford, or the combination of developments proposed for Byfleet and Pyrford. Martyrs Lane would clearly alleviate the inevitable congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking. Martyrs Lane has better road links to Woking , Chertsey and the M25.

Pyrford and Byfleet are only accessible by B or C Roads.

A new school could be built on the site.

The site benefits from bus services.

Pyrford Green Belt is used for recreation purposes. Martyrs Lane is not easily accessible and rarely used by the public.

The Pyrford fields are surrounded by heritage assets and are integral to the heritage setting of the area.

Martyrs Lane has limited footpaths and no known heritage value.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the 6 original sites.

**Officer Response:**

Support for the Martyrs Lane site and objection to the safeguarding of land in Pyrford for future development needs is noted.

The reasons against development in Pyrford have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular, the representations relating to heritage, landscape, amenity and well being and infrastructure.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1024 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

Whilst it is correct that the Martyrs Lane site is of a significant size, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all

assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);

- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02184/1/001  
**Customer Name:** Ms Ann-Marie Grout

**Summary of representation:**

Strong views that Martyrs Lane is the best option when compared against the other alternatives. Pyrford is inappropriate for development based on the following reasons.

The Pyrford sites have been farmed for centuries and are in keeping with the rural character of the area. This is highlighted in the Pyrford Neighbourhood Plan. Pyrford sites are a contributing asset used for agriculture whereas the Martyrs Lane site has no current use at all.

Understands that the site was granted planning permission for a factory, which was revoked at the request of the applicant. The case officer considered the impact on the Green Belt and assessed that building at a large scale on the site presented no risk of merger and sprawl.

The northern part of the site can deliver 1024 homes as required by the Regulation 18 Site Allocations DPD. The housing numbers being used by the No Woodham New Town Group is completely without foundation.

There is enough land to the north of the New Zealand Golf Course for it to be retained.

The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford.

The Brett report considered Pyrford land to be in category Major Environmental Constraint. The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character. Concludes that the Brett Report supports the suitability of Martyrs Lane for development on all counts.

The Martyrs Lane site is previously developed land.

The site would offer economies of scale making it easier to deal with infrastructure provision. The site can deliver affordable housing, whilst Pyrford is expensive and executive housing will not benefit those employed by St Peters Hospital. A bus connects the site to the hospital.

Surrey County Council reports state that the Martyrs Lane development will have less impact on traffic conditions than the development proposed for Mayford, or the combination of developments proposed for Byfleet and Pyrford. Martyrs Lane would clearly alleviate the inevitable congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking. Martyrs Lane has better road links to Woking, Chertsey and the M25.

Pyrford and Byfleet are only accessible by B or C Roads.

A new school could be built on the site.

The site benefits from bus services.

Pyrford Green Belt is used for recreation purposes and is rich in wildlife. Martyrs Lane is not easily accessible and rarely used by the public.

The Pyrford fields are surrounded by heritage assets and are integral to the heritage setting of the area.

Martyrs Lane has limited footpaths and no known heritage value. No point living in a Conservation Area if the land to the rear of their house is a modern housing estate.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the 6 original sites.

**Officer Response:**

Support for the Martyrs Lane site and objection to the safeguarding of land in Pyrford for future development needs is noted.

The reasons against development in Pyrford have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular, the representations relating to heritage, wildlife, landscape, amenity and well being and infrastructure.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1024 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

Whilst it is correct that the Martyrs Lane site is of a significant size, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all

assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);

- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

**Contributor Reference:** 02143/1/001  
**Customer Name:** Ms Erika Vincent

**Summary of representation:**

Support for the Martyrs Lane proposal.

The site is large enough to accommodate 1200 houses with supporting infrastructure. There are already major employers close by and new facilities on site would create new employment opportunities.

The site is close to the A320 and offers each access to the M25, airports and Woking town centre. There are existing bus, cycle and foot routes. It is also close to the centre of Byfleet with its own station and amenities. Alternative sites have poor access to the A320 which is already at capacity.

The A320 to the north of Woking can and should be widened.

Although Green Belt, the site is derelict and permission granted for a factory. The land is suitable for development.

Other areas of south Woking can retain their Green Belt and maintain the gap between Woking and Guildford.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County

Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking

Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites. The site is not within reasonable walking or cycling distance of Byfleet Station or Byfleet Local Centre, as suggested in the representation.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The representation regarding maintaining the gap between Woking and Guildford has been addressed by the Council in the Regulation 18 Issues and Matters Topic Paper.

**Contributor Reference:** 02152/1/001  
**Customer Name:** Mr William Hartley

**Summary of representation:**

More homes are needed across the country and house prices are too high.

People against the development must be selfish not to allow new houses being built.

The downside of the proposal would be the increase in traffic but the funds raised through extra Council tax could be used towards road improvements in the area.

**Officer Response:**

Support for the Martyrs Lane site is noted by the Council.

As set out in the Core Strategy, affordability or the ability for people to get on the property ladder is a key issue. The Council is therefore fully committed to the comprehensive delivery of the Core Strategy which aims to facilitate the delivery of 4964 dwellings over the Plan Period as well as safeguard land for future development needs.

Whilst it is acknowledged that the site could deliver a significant number of new homes, cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02163/1/001  
**Customer Name:** Ms Judith Oakley

**Summary of representation:**

It is established planning policy that alteration of the Green Belt should only be undertaken in exceptional circumstances. Understands that if Woking is required to offer possible sites then Martyrs Lane has distinct locational advantages.

There are major employers nearby as well as Woking Town Centre.

It has access to the A320 to the M25, airports as well as Woking and West Byfleet railway stations. Access to the M25 without driving through Woking is of real significance.

It has no landscape importance and surrounded by trees and planting to the site edges. It is an uninteresting piece of land with clear boundaries and is well suited to a contained development.

It is a large enough site to produce a well thought out community with good infrastructure and clear boundaries. Smaller sites produce little housing estates putting a real burden on the existing infrastructure.

Martyrs Lane site provides a real opportunity to develop a vibrant new community and is a better solution than the original six sites.

**Officer Response:**

It is correct that the Council is required to fully justify its decision to release Green Belt land for development as part of the plan making process. As set out in the Regulation 18 consultation Issues and Matters Topic Paper, in the opinion of the Council the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established in the Core Strategy and is consistent with national planning policy.

The overall purpose of the Site Allocations DPD is to identify specific sites that will facilitate the comprehensive delivery of the Core Strategy. The representations received from the land to the east of Martyrs Lane consultation will be used to inform the Council's preferred safeguarding option.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor between Woking and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Council's Landscape Assessment and Green Belt Review specifically assessed the landscape and Green Belt of the Martyrs Lane site. It agreed that the site is surrounded by trees and planting and has well contained boundaries. Nevertheless the overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not simply whether the site has well contained boundaries. This will however be one of many material considerations that will be carefully considered by the Council in making its decision.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic

employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02121/1/001  
**Customer Name:** Mr Simon Westmoor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02123/1/001  
**Customer Name:** Ms Marion Simpson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02124/1/001

**Customer Name:** Ms Jane Ford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02129/1/001  
**Customer Name:** Mr Roger Pashley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02139/1/001  
**Customer Name:** Mr Simon Bailey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02140/1/001  
**Customer Name:** Ms Katherine Sutcliffe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02144/1/001  
**Customer Name:** Ms Melanie Clark

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02151/1/001  
**Customer Name:** Ms Janette McGuinness

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02154/1/001  
**Customer Name:** Mr Imran Hamid

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02155/1/001  
**Customer Name:** Ms Natasha Quader

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02158/1/001

**Customer Name:** I Hamid

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02174/1/001  
**Customer Name:** Ms Amanda Leonard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02177/1/001  
**Customer Name:** Ms Luisa Minter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02179/1/001  
**Customer Name:** Ms Hilary Lakin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02199/1/001  
**Customer Name:** Mr David Embury

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02204/1/001  
**Customer Name:** Ms Janet Kearns

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02222/1/001  
**Customer Name:** Ms Laura Piatti-Powell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02228/1/001

**Customer Name:** Mr Will Riley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02658/1/001  
**Customer Name:** Ms Wendy Aldons

**Summary of representation:**

Supports the proposal.

Developing the original small areas would overload services. The school and leisure centre at Egley Road are more than enough to burden Mayford.

The Martyrs Lane site is larger, with better access to main roads, motorways, the airport, stations, Woking Town, hospitals.

It would accommodate the infrastructure and facilities to support housing such as primary schools, health centre, local shops etc.

There are major employers nearby.

**Officer Response:**

Support is noted.

The Regulation 18 consultation Issues and Matters Topic Paper addresses in detail the issues set out in the representation associated with the original six sites.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of the required new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Accessibility as described in the representation is acknowledged. However, there may be traffic impacts associated with a development of this scale, which may impact on accessibility.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking

Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The merits set out in the representation regarding infrastructure are noted, and will weigh in the balance of considerations by Members. The Council will, however, make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. Whilst the Council recognises that local residents are concerned about overstressing local facilities, the Council continues to work with infrastructure providers to ensure that existing capacity is available to accommodate new development, or that new infrastructure is provided if necessary.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02194/1/001

**Customer Name:** Mark Busby

### **Summary of representation:**

Support the Martyrs Lane proposal.

The site is large enough to accommodate 1200 homes, including affordable housing, Gypsy and Traveller accommodation and the necessary infrastructure such as shops, primary schools, health centres, etc. etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

It will simplify the process for obtaining planning permission.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus and cycle routes already exist. There is little development along the A320 so road widening if needed would be easy. The A320 to the south of Woking is already at capacity before the Hoe Valley School has opened.

The site has no national or local landscape designation unlike the other sites.

Most of the site is within Flood Zone 1 and will make the planning and development process simpler and more cost effective.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

Master planning of the total residential development would allow for the provision of Affordable Housing and specialist residential accommodation, something that the Council is currently under providing.

Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking. Currently, almost all other pitches are at the South West side of Woking. The site is in a sustainable location, close to services and facilities. It would comply with the requirements of CS14. Ten Acre Farm can therefore be removed from the Site Allocations DPD for traveller accommodation.

Due to the size of the site, it will be possible to meet all of Woking future housing and traveller needs on one site between 2017 and 2040 and beyond 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor along Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02269/1/001  
**Customer Name:** Mr David Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02206/1/001  
**Customer Name:** Ms Emily Gale

**Summary of representation:**

Supports the proposal, in favour of developing fields in Pyrford.

The fields play a critical role in protecting the Green Belt.

There would be increased road traffic, and would place strain on schools, trains and health services.

It would harm the heritage landscape in the area.

The rural character of the area enjoyed from rights of way will be greatly harmed.

**Officer Response:**

Support for the proposal is noted.

The Regulation 18 Consultation Issues and Matters Topic Paper addresses the issues raised in detail, including the implications of developing the originally proposed sites in terms of impact on the Green Belt (Section 2 and 10); on infrastructure (Section 3); on transport infrastructure (Section 20); and on landscape and character (Section 7, 19 and 23).

**Contributor Reference:** 02227/1/001  
**Customer Name:** Mr Stephen Carlile

**Summary of representation:**

Objects to the proposal.

- Loss of Green Belt land, leading to urban sprawl – particularly with Fair Oaks proposal;
- Increased flood risk due to increased urban surface area and loss of trees;
- Pressure on existing roads, particularly A320;
- Lack of public transport;
- Stress on existing infrastructure and no plans for new infrastructure;
- Severe loss of wildlife;
- Loss of trees and woodland;
- Under the flight path;
- Recycling centre located in the middle of the site.

**Officer Response:**

Objection is noted.

All of the issues raised are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02258/2/001  
**Customer Name:** Ms Hannah O'Reilly

**Summary of representation:**

Objects to the proposal:

- Loss of Green Belt land
- Loss of woodland and habitat for wildlife
- Further pressure on transport network
- Stress upon existing infrastructure with no evidence to plan for more schools or hospitals

**Officer Response:**

Objection is noted.

All of the issues raised are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02266/1/001  
**Customer Name:** Garrett O'Reilly

**Summary of representation:**

Objects to the proposal:

- Loss of Green Belt land
- Loss of woodland and habitat for wildlife
- Further pressure on busy transport network
- Lack of public transport to support a growing community
- Stress upon existing infrastructure with no evidence to plan for more schools or hospitals
- Recycling plant sits in the centre of the proposed development

**Officer Response:**

Objection is noted.

All of the issues raised are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02233/1/001  
**Customer Name:** Mr Nicholas Mendham

**Summary of representation:**

Support the Martyrs Lane proposal in favour of Mayford sites.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

The site is large enough to accommodate 1200 homes, including affordable housing, Gypsy and Traveller accommodation and the necessary infrastructure such as shops, primary schools, health centres, etc. etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. There is little development along the A320 so road widening if needed would be easy.

The site has no national or local landscape designation unlike the other sites.

Most of the site is within Flood Zone 1 and will make the planning and development process simpler and more cost effective.

Master planning of the total residential development would allow for the provision of Affordable Housing and specialist residential accommodation, something that the Council is currently under providing.

Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking. Currently, almost all other pitches are at the South West side of Woking. The site is in a sustainable location, close to services and facilities. It would comply with the requirements of CS14. Ten Acre Farm can therefore be removed from the Site Allocations DPD for traveller accommodation.

Due to the size of the site, it will be possible to meet all of Woking future housing and traveller needs on one site between 2017 and 2040 and beyond 2040.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar

amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has

the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor along Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the

Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02239/1/001  
**Customer Name:** Mr Alan Buckland

**Summary of representation:**

Support the Martyrs Lane proposal.

Due to the size of the site, it will be possible to meet all of Woking future housing and traveller needs on one site between 2017 and 2040 and beyond 2040.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus and cycle routes already exist. There is little development along the A320 so road widening if needed would be easy. The A320 to the south of Woking is already at capacity before the Hoe Valley School has opened.

The site is large enough to accommodate plenty of homes, including affordable housing, Gypsy and Traveller accommodation and the necessary infrastructure such as shops, primary schools, health centres, etc. etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

It will simplify the process for obtaining planning permission.

The site has no national or local landscape designation unlike the other sites.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also

confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and

jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor along Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

**Contributor Reference:** 02242/1/001

**Customer Name:** Mr And Mrs Peter And Elizabeth Gardner

**Summary of representation:**

Supports the proposal in favour of safeguarding sites in Pyrford.

The fields are a vital aspect of the local countryside – a view supported by Inspectors in previous planning enquiries.

Building on them would be a blot on the landscape, and would put severe stress on local infrastructure.

The development would be visible for miles as it would be on top of the escarpment.

**Officer Response:**

Support is noted.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. The Green Belt review methodology took into account landscape constraints and sensitivity to change. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

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It should be noted that any development coming forward in the future would need to meet a series of key requirements, including those on design which require development to make a positive contribution to the character of the area in which they are situated, and incorporating landscape to enhance the setting of development. Officers are satisfied that the recommendations of the Green Belt review are sound, and that parts of the Pyrford sites could be developed without compromising the integrity of the local landscape designations.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Regulation 18 Consultation Issues and Matters Topic Paper addresses some of the issues raised in the representation in detail, including infrastructure provision (Section 3 and M), and impact on landscape and character (Sections 7 and 23).

**Contributor Reference:** 02249/1/001  
**Customer Name:** Ms Alison Buckland

**Summary of representation:**

Support the Martyrs Lane proposal.

Due to the size of the site, it will be possible to meet all of Woking future housing and traveller needs on one site between 2017 and 2040 and beyond 2040.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus and cycle routes already exist. There is little development along the A320 so road widening if needed would be easy. The A320 to the south of Woking is already at capacity before the Hoe Valley School has opened.

The site is large enough to accommodate plenty of homes, including affordable housing, Gypsy and Traveller accommodation and the necessary infrastructure such as shops, primary schools, health centres, etc. etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

It will simplify the process for obtaining planning permission.

The site has no national or local landscape designation unlike the other sites.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also

confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and

jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

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The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

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The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

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It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

**Contributor Reference:** 02250/1/001  
**Customer Name:** Ms Ellen Buckland

**Summary of representation:**

Support the Martyrs Lane proposal.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus and cycle routes already exist.

The site is large enough to accommodate plenty of homes, including affordable housing, Gypsy and Traveller accommodation and the necessary infrastructure such as shops, primary schools, health centres, etc. etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor along Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

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Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport

Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of plenty of new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

**Contributor Reference:** 02252/1/001  
**Customer Name:** Mr Kevin Farquharson

**Summary of representation:**

Support the Martyrs Lane proposal.

The site is large enough to accommodate 1200 homes, including the necessary infrastructure.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus and cycle routes already exist. There is little development along the A320 so road widening if needed would be easy. The A320 to the south of Woking is already at capacity before the Hoe Valley School has opened.

The land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

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It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02268/1/001  
**Customer Name:** Mr And Mrs Len And Kristen Louis

**Summary of representation:**

Support the proposal.

The site is situated within ordinary landscape, well-contained with trees. Can avoid negatively impacting the landscape.

Good proximity to local services, amenities, employment and motorway links, making it ideal for local employment, sustainable traffic flow, access and accessibility. It represents an efficient and sensible use of land.

Development will result in an increase in land values. Profits should be re-invested into the new community and surrounding area for the benefit of the people of Woking.

Better to release a single, large site from the Green Belt rather than several smaller, scattered bolt-on sites, which would result in housing estates rather than sustainable communities, putting pressure on existing communities. Larger site allows for better infrastructure investment and planning of a distinctive place.

The very act of seeking to safeguard land to the east of Martyrs Lane, and "replacing" (as contended by Woking Borough Council) sites proposed for safeguarding in the unsound draft Site Allocations DPD published in 2015, has obvious and relevant direct impacts on other sites proposed for removal from the Green Belt prior to 2027. In addition, there are no "safeguarded sites," as alleged by the Consultation Statement in Paragraphs 1.10 and 1.11. There is no up to date adopted planning policy, guidance or statement that safeguards the sites referred to for removal from the Green Belt, or that identifies the sites for removal from the Green Belt prior to 2027. The Consultation Paper makes assertions that are simply wrong.

The Council has a statutory duty to demonstrate that its approach to the Green Belt review reflects the great importance to the Green Belt as described in the NPPF. The Council should address and amend the flawed approach set out in the Consultation Paper.

**Officer Response:**

Support is noted. The merits of the proposal as put forward in the representation will weigh in the balance of considerations by Members.

The references to impacts on landscape are noted. The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and

- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

The Peter Brett report makes its recommendations on safeguarding the originally proposed sites after acknowledging the references made in the representation, and taking into account potential impacts on landscape character. Detailed analysis and reasons for this recommendation are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers, and that there would be an opportunity for residents to live near their jobs, using sustainable means of transport. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

In terms of traffic flow and accessibility:

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts, as suggested in the representation. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of investing in infrastructure for the benefit of all:

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Officers are confident that the design planning policies of the Development Plan will lead to the delivery of high quality, sustainable communities be it on a single site or on multiple sites. The detailed masterplanning of the sites would take place at the Development Management stage.

With regards to the wording of the Consultation Paper:

The preparation of the Site Allocations DPD is the formal process that will ultimately confirm the status of each of the sites designated within it, including those that are earmarked for safeguarding. The sites that have been identified in the Regulation 18 version are those that the Council had proposed for the purposes of safeguarding if it is examined and approved. The Land to the east of Martyrs Lane Consultation Document is careful to use the term 'proposed sites' and the introduction to the draft Site Allocations DPD also makes it clear that the sites are proposed at this stage.

The Council published the draft Site Allocations DPD for public consultation between 18th June and 31st July 2015. The publication of the draft document was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document clearly identified a number of sites that would be safeguarded for future development needs between 2027 and 2040. To clarify, the draft Site Allocations DPD safeguarded the following sites for future development needs:

GB4: Land south of High Road, Byfleet

GB5: Land to the south of Murray's Lane, Byfleet

GB9: Woking Garden Centre, Egley Road, Mayford

GB10: Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford

GB11: Land to the north west of Saunders Lane, Mayford

GB12: Land rear of 79-95 Lovelace Drive, Teggs Lane, Pyrford

### GB13: Land east of Upshot Lane and south of Aviary Road, Pyrford

As well as clearly identifying specific sites for safeguarding, Paragraph 216 of the National Planning Policy Framework (NPPF) states that at this stage of the process, the document can be afforded very limited weight in the determination of planning applications. Therefore despite not being an adopted Council document, it does form part of the Development Plan for Woking Borough.

Based on the above, whilst the Site Allocations DPD has not been adopted by the Council at this stage it is clear that the formal plan making process has started and that the Martyrs Lane consultation document was correct in identifying the original sites as 'safeguarded sites in the draft Site Allocations DPD'.

It should be noted that the Regulation 18 version of the Site Allocations DPD is based on a wide range of evidence base documents and not entirely on the Green Belt boundary review prepared by Peter Brett Associates. As set out in Section 8.0 of the Regulation 18 consultation Issues and Matters Topic Paper, the Council has used a number of evidence base documents to inform the Site Allocations DPD. Since the publication of the draft Site Allocations DPD, the Council has also published a number of other evidence base documents including additional transport and landscape studies. Further details can be found on the Council's website as well as within the Land to the east of Martyrs Lane Consultation Document.

**Contributor Reference:** 02251/1/001  
**Customer Name:** Mr Justin Quintal

**Summary of representation:**

Supports the proposal.

Pyrford roads cannot accommodate further traffic, even if widened. The infrastructure in terms of not only roads but alternative routes and drainage is of concern.

Pyrford's unique, semi-rural setting is largely unspoilt with open views south. The escarpment is a key constraint. Fields have been farmed for centuries. A distinctive area, as highlighted in the Neighbourhood Plan.

North of the golf course the land is largely disused and derelict, with no landscape element, no known footpaths and limited public use.

The Martyrs Lane site should be selected before the fields in Pyrford as performs better against criteria in Green Belt review.

A single site would provide some economies of scale to provide some alleviation towards all the infrastructure issues – water, waste, electricity.

Fewer residents would experience traffic disruption from a single site.

Traffic studies show congestion likely to be alleviated in West Byfleet. The northern part of the site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre.

Pyrford Primary School is full. The Martyrs Lane site presents opportunities for a new school.

There are clear benefits to developing the Martyrs Lane site – most viable, effective and economic option.

**Officer Response:**

Support is noted and the merits as set out in the representations will weigh in the balance of considerations by Members.

In terms of traffic impacts:

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. The Transport Assessment also identified the A245 (Parvis Road) as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

Regarding landscape:

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The report takes landscape features such as the escarpment into account.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are

classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

In terms of infrastructure provision, a number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites. The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal. The Council is proactively working with infrastructure service providers, such as Surrey County Council as education and transport authority, to ensure that there is sufficient capacity in existing infrastructure, or alternative, new infrastructure can be provided, to support future growth in the Borough.

**Contributor Reference:** 02263/1/001  
**Customer Name:** Mr Paul Allard

**Summary of representation:**

Supports the proposal.

The sites around Saunders Lane are served by roads unsuitable for an increase in traffic, with a lack of footpaths, which encourage motorised transport to the limited local amenities. Single lane bridges already slow traffic immensely. The additional traffic resulting from these plans will cause severe back logs at these key points.

The Martyrs Lane site is close to major traffic routes that can accommodate more traffic, which were purpose-built for a larger volume of motorised transport than those around Saunders Lane.

The loss of green spaces between Mayford and Woking will turn Mayford into a suburb of Woking, increasing the risk of merging with Guildford. A significant purpose of the Green Belt. There has been no consideration for preserving Mayford as a separate settlement to Woking, nor the impact on the character of the village.

The Martyrs Lane site would not result in the same degree of merging of settlements as a significant amount of green space will remain between this settlement and its neighbours.

**Officer Response:**

Supports the proposal, particularly in favour of development around Saunders Lane.

The Regulation 18 Consultation Issues and Matters Topic Paper addresses some of the issues raised in detail, including traffic and landscape character impacts at Sections 3, 7, 20, 23, U and V.

Section 12 addresses concerns over separation of settlements (referring specifically to Mayford and Guildford), and Section 15 on urban sprawl.

Section E addresses concerns about lack of pavements and potential for increase in car travel.

Regarding the representation on impacts of development at Martyrs Lane on the integrity of the Green Belt:

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land

has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

Regarding the traffic impacts of development at Martyrs Lane:

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 02134/1/001  
**Customer Name:** Ms Meredith Hopkins

**Summary of representation:**

Objects to the proposal.

Surprised that the draft Site Allocations DPD is being challenged and that land to the east of Martyrs Lane is now being proposed for a disproportionately large development on an area which lacks any infrastructure for its support.

**Road Network:**

The A245 and A320 are at maximum capacity. Further traffic will lead to gridlock.

The Six Crossroads Roundabout is at capacity and needs to be reconfigured for safety with the current levels of traffic.

The soil formation under the A320 is subject to sinkholes.

Delays on the A320 have implications for the speedy and safe transport passage of patients to St Peter's Hospital.

Development at Martyr's Lane would add to the increased traffic issues from the proposed Longcross and Fair Oaks developments in other boroughs.

The Martyr's Lane Junction with the A246 has already been subject to a Traffic Regulation Order (2012).

**Loss of Amenity:**

Urban Sprawl would significantly change the area, with no significant SANG provision. There will be a complete alteration of character.

Pollution levels from increased traffic would be intolerable.

Cycle ways would become unsafe.

The SPA would need to be replaced – Horsell Common Preservation Society estimates that 135 acres of open land would need to be identified in mitigation of damage which would be done to the Special Protection Area.

**Sustainable Development:**

The Martyr's Lane Recycling Centre is working at capacity already.

There is a lack of public transport e.g. bus services.

Local stations are at capacity and beyond reasonable walking distance.

New infrastructure would need to be provided. Existing infrastructure within reasonable distance has no capacity ie. schools, medical centre, community centre, sport/open areas, library, shops, broadband/mobile connections, sewerage/drainage/refuse.

Finally, the LDF Working Group should be made up of Members which give a fair reflection of the Borough as a whole – not just consist of Members from the south of the Borough. The current group should be disbanded and reformed to represent the entire Borough.

## Officer Response:

Objections to the proposal are noted and will weigh in the balance of considerations by Members.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses many of the details raised in the representation in detail, including: traffic implications including impacts on the A245 and A320; how transport mitigation measures will be required to ensure safety is maintained; the potential for urban sprawl and impact on landscape designations, including the Green Belt; the public transport provision and accessibility to train stations; the provision of infrastructure (including public transport infrastructure); issues with sink holes; the impacts on the recycling centre; whether the development would amount to 'sustainable development'; the make-up of the LDF Working Group and intentions to re-constitute the group.

With regards to cumulative traffic impacts with the Fair Oaks and Longcross proposals:

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the impacts on the environment and provision of SANG:

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy. The Council's response to these organisations can be accessed for further information on this issue.

Policy CS8: Thames Basin Health SPA of the Core Strategy accords priority to the SPA. The policy allows scope for bespoke SANGs to be secured if it is considered feasible and deliverable. The Council takes a precautionary approach towards harming the SPA and as such has applied this rigorously, and will continue to do so in the future. The Council has identified sufficient SANG capacity through existing SANG sites and proposed allocations in the draft Site Allocations DPD to enable the delivery of the Core Strategy and beyond. The Council will engage with Natural England to agree the nature and size of SANG that will be needed to serve this development if it is allocated.

**Contributor Reference:** 02135/1/001  
**Customer Name:** Mr And Mrs G And S Emes

**Summary of representation:**

Support proposal, in favour of development at Pyrford, with the exception of building on the golf course.

Martyrs Lane site has little scenic value and little public amenity value.

The fields in Pyrford form part of the best rural landscape in the Woking area. It is important to preserve its countryside feel for future generations to enjoy.

Martyrs Lane site is better connected to the road network and better placed to deal with additional traffic. The Pyrford roads are narrow and badly equipped to deal with increased traffic congestion – in particular Coldharbour Road where it passes the primary school.

**Officer Response:**

Support is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is recognised that the local community in Pyrford highly values its rural landscape. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features and locally valued landscape features such as footpaths within and in close

proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage and landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are situated.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. The Regulation 18 Issues and Matters Topic Paper sets out a detailed response (under Section 3) to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02018/2/001  
**Customer Name:** Ms Margaret Hornsby

**Summary of representation:**

Objects to the proposal:

Pressure on existing roads, especially A320;

Lack of public transport;

Stress on existing infrastructure with no plans to build more schools or hospitals in the area;

The recycling centre is located in the middle of the proposed development.

**Officer Response:**

Objection is noted.

The issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02141/1/001

**Customer Name:** Hook Heath Residents Association

**Summary of representation:**

**Representation A:**

The Hook Heath Residents' Association support the proposal – it represents an appropriate location for sustainable development.

The HHRA would not normally support release of land from the Green Belt for development. However, as the Core Strategy Inspector established a requirement for a Green Belt Review, the HHRA accepts the need for appropriate release of Green Belt land in Woking to support sustainable development. HHRA do not believe the Council have produced any robust, substantive evidence to justify the need to safeguard land for 1,200 homes in the Green Belt during 2027–2040, but focus below on the merits of safeguarding land east of Martyrs Lane assuming this evidence will eventually be produced.

The site has distinct locational advantages, and:

- Major employers are nearby, including McLaren, St Peter's Hospital, the Animal and Plant Health Agency and employment areas around Albert Drive to the south west. There is also easy access to these employers. Future residents can live near to their jobs, providing opportunities for more sustainable patterns of movement e.g. walking, cycling and use of public transport.
- Opportunities for sustainable patterns of movement: West Byfleet station is within reasonable walking and cycling distance; Woking station is within cycling distance. The A245 has bus links. Further bus services can be provided, linking the site with the town centre, areas of employment and public transport hubs.
- Access and accessibility: the whole of the site is readily accessible and provides outstanding road links via the A245, A320 and M25. Safe and suitable access can be provided.
- Landscape character: the site is situated within an indistinctive landscape and is well-contained, with trees and planting to site edges (whereas much of the land to the north, south and west of Woking represents high quality landscape character). Development would not lead to significant harm on landscape. The Core Strategy affords significant weight to the protection of local landscape e.g. via policy CS24 (which was largely ignored by the Green Belt review – a fundamental flaw). The Martyrs Lane site does not conflict with CS24.
- Efficient and effective use of land: opportunity to regenerate disused parts of the site and a waste site, according with para.17 of the NPPF, via a comprehensive, master-planned approach to the benefit of the public.

– Delivery of sustainable development: opportunity to plan over the next ten years for an outstanding new sustainable community. Land values will increase by almost 10,000%, and money can be re-invested into the new community and surrounding area for overall benefit of the people of Woking. Better opportunity to plan for affordable housing, excellent architecture, new schools, community services and facilities, efficient public transport, high quality ongoing estate management – as opposed to another bland housing estate, largely reliant upon existing overstretched services and infrastructure.

A development brief for the site evolved through public consultation would be essential. The Council should encourage the development of a neighbourhood plan, with the site as its focus. This would encourage a community-driven development.

All of this is achievable due to the large scale of the site. Smaller sites for housing result in 'housing estates' rather than sustainable communities.

– A permanent Green Belt: the release of a single, large site with logical boundaries and comprising areas of similar character (rather than entirely distinctive areas being lumped together simply because they're adjacent) provides for a reasonable change to the Green Belt, and will not create isolated Green Belt land, in line with NPPF policy. The openness of the surrounding Green Belt can then be preserved, as per the NPPF.

Representation B: objection to the Consultation Paper's approach to the release of other sites in the Green Belt prior to 2027

The Consultation Paper is flawed. It uses irresponsible wording: it contends there are safeguarded sites for release from the Green Belt, which is incorrect. The Regulation 18 plan was the subject of significant objection due to major flaws in its production and content. There are no policies that safeguard sites and therefore there are none to be replaced with the Martyrs Lane site.

The replacement of the six sites would in fact have a relevant impact on other sites identified for release from the Green Belt e.g. site GB14, which is intrinsically related to sites GB10 and GB11. If GB10 and GB11 are not to be removed from the Green Belt, neither should GB14 (ref. WGB020g).

The Consultation Paper is therefore misleading to suggest that there will not be an impact on previously proposed sites for removal from the Green Belt prior to 2027.

The HHRA object to the attempt of the Consultation Paper to legitimise the content of a flawed draft DPD. It is argued that a major release of land from the Green Belt has been proposed (rather than the stated minor amendments on p3 of the DPD), which requires clear, well-evidenced justification. The Green Belt boundary review is fundamentally flawed (as demonstrated in representations made during the Regulation 18 consultation), and the Council cannot therefore legitimately rely upon its draft Site Allocations DPD, which is referred to in the Consultation Paper.

Unless it addresses and amends the erroneous approach in paragraphs 1.10 and 1.11 of the Consultation Paper, the Council risks failing in its statutory duty to demonstrate its approach to the Green Belt review reflects the great importance attached to Green Belts (as per NPPF). It is therefore open to legal challenge.

#### **Officer Response:**

The merits of the proposal as put forward in Representation A are noted and will weigh in the balance of considerations by Members.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers, and that there would be an opportunity for residents to live near their jobs, using sustainable means of transport. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts, as suggested in the representation. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website. Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve bus service provision and frequency whether the six sites or Martyrs Lane is developed. It is accepted that there may be an economy of scale associated with the Martyrs Lane for investment in public transport infrastructure, as suggested in the

representation, but the originally proposed sites are also of a sufficient scale to allow for infrastructure improvements in these areas.

The Council will work with a range of infrastructure providers such as Surrey County Council and Clinical Commissioning Groups, whose views (on transport infrastructure, education, healthcare provision etc) will be seriously considered if the Martyrs Lane site is to be allocated. If the need is proven at the time of the review of the Core Strategy and/or the Site Allocations DPD (i.e. at the time the site would be allocated rather than safeguarded), the Council will include various key requirements on infrastructure provision for the development of the site to be acceptable. The Council will work constructively with infrastructure providers to support the development of the land if it is allocated and/or developed. This is equally true of the originally proposed sites.

Regarding the representation on landscape character, the Peter Brett Green Belt Boundary Review recommends a range of sites that are suitable to be safeguarded for development. It makes this recommendation after acknowledging the references made in the representation (on quality of landscape character and policy constraints). Detailed analysis and reasons for these recommendations are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The report specifically refers to the policy relating to the protection of the escarpment, and makes recommendations about which parts of sites could be developed without compromising the integrity of the escarpment. It should be noted that if the originally proposed sites were selected for safeguarding, key requirements for developing the sites would be set out as part of the review of the Core Strategy and/or Site Allocations DPD, to be informed by up-to-date evidence at the time. It is likely, however, that key requirements would require any development to pay regard to landscape character, including designations such as the escarpment and rising ground of landscape importance (taking into account recommendations from the evidence base about which parts of sites are developable without compromising landscape character). These constraints are not considered to be major and could be accommodated in development with design or mitigation. The Council agrees that the Development Plan for Woking has robust policies in place to protect valued local landscape, and these policies must be taken into account by any development coming forward.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site, including its landscape sensitivity, are set out in paragraph 3.5.11. The site is considered to have a low capacity for change, and development would lead to significant adverse effects on the landscape pattern and features. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all

ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed.

The merits of delivering sustainable development at this location as set out in the representation are noted. The Council proactively works with the local community in setting up Neighbourhood Forums and preparing Neighbourhood Plans, and would welcome assisting the community in the Woodham and Horsell area should this site be selected for safeguarding.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts. The adoption of a Neighbourhood Plan, potentially including a design code for the site as suggested, could also facilitate the collection and investment of CIL monies which can be spent by the Forum on any infrastructure projects identified in this area. This is also true of the originally proposed sites which fall within adopted Neighbourhood Plan boundaries.

The Council has adopted a Statement of Community Involvement (2015) setting out how public consultation is considered to be a key part of the planning process. The Council encourages pre-application consultation with the community, and in particular recommends public meetings combined with design exercises for large-scale development (where sites would accommodate 200 dwellings or more, or where site area is 4ha or more). This would apply to all sites under consideration for safeguarding, with a view to achieving community-led development.

The Council's approach of looking ahead into the future beyond the period of the Core Strategy is necessary to ensure that there is a permanent and enduring defensible boundary of the Green Belt, consistent with the NPPF, as reflected in the representation. Officers are satisfied that the letter and spirit of Section 9 of the NPPF (which deals with the protection of Green Belt land) has been followed in preparing the draft Site Allocations DPD. It is agreed that the release of the Martyrs Lane site from the Green Belt will achieve logical and defensible boundaries, but this is also true of the originally proposed sites. Further detail is provided in Section 2 of the Regulation 18 Consultation Issues and Matters Topic Paper.

In conclusion, the Council notes the locational advantages of the Martyrs Lane site as set out in the representation. The merits of the original six sites have already been given in the Officer's

response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

#### Representation B:

The preparation of the Site Allocations DPD is a formal process that will ultimately confirm the status of each of the sites designated within it, including those that are earmarked for safeguarding. The sites that have been identified in the Regulation 18 version are those that the Council had proposed for the purposes of safeguarding if it is examined and approved. The Land to the east of Martyrs Lane Consultation Document is careful to use the term 'proposed sites' and the introduction to the draft Site Allocations DPD also makes it clear that the sites are proposed at this stage.

The Council published the draft Site Allocations DPD for public consultation between 18th June and 31st July 2015. The publication of the draft document was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The document clearly identified a number of sites that would be safeguarded for future development needs between 2027 and 2040. To clarify, the draft Site Allocations DPD safeguarded the following sites for future development needs:

GB4: Land south of High Road, Byfleet

GB5: Land to the south of Murray's Lane, Byfleet

GB9: Woking Garden Centre, Egley Road, Mayford

GB10: Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford

GB11: Land to the north west of Saunders Lane, Mayford

GB12: Land rear of 79-95 Lovelace Drive, Teggs Lane, Pyrford

GB13: Land east of Upshot Lane and south of Aviary Road, Pyrford

As well as clearly identifying specific sites for safeguarding, Paragraph 216 of the National Planning Policy Framework (NPPF) states that at this stage of the process, the document can be afforded very limited weight in the determination of planning applications. Therefore despite not being an adopted Council document, it does form part of the emerging Development Plan for Woking Borough.

Based on the above, whilst the draft Site Allocations DPD has not been adopted by the Council at this stage it is clear that the formal plan making process has started and that the Martyrs Lane consultation document was correct in identifying the original sites as 'safeguarded sites in the draft Site Allocations DPD'. The Council has referred to the DPD as a draft.

It should be noted that the Regulation 18 version of the Site Allocations DPD is based on a wide range of evidence base documents and not entirely on the Green Belt boundary review prepared by Peter Brett Associates. As set out in Section 8.0 of the Regulation 18 consultation Issues and Matters Topic Paper, the Council has used a number of evidence base documents to inform the Site Allocations DPD. Since the publication of the draft Site Allocations DPD, the Council has also published a number of other evidence base documents including additional

transport and landscape studies. Further details can be found on the Council's website as well as within the Land to the east of Martyrs Lane Consultation Document.

It was not the intention of the Council to mislead the community by referring only to the substitution of proposed sites between 2027–2040. Site GB14 was excluded because it was not proposed to be safeguarded for housing development, but rather for green infrastructure purposes. The thrust of this consultation exercise is to gain views to inform the Council's future decisions on whether the Martyrs Lane site would be a reasonable substitute to deliver the same minimum amount of housing that the originally proposed sites which were allocated for housing would deliver. The draft Site Allocations DPD does include sites GB14 and WGB020g to assist in ensuring a strong defensible Green Belt boundary is achieved. It would therefore be reasonable to reconsider the inclusion of these sites in the next iteration of the Site Allocations DPD should the Council decide to substitute sites GB10 and GB11 with the Martyrs Lane site.

Offices are aware of the criticism made against some of the details of the Green Belt boundary review. Officers are satisfied that the studies supporting the draft Site Allocations DPD are robust and sufficiently comprehensive to withstand scrutiny at Examination. The Council sets out its reasons for this position in detail in the Regulation 18 Consultation Issues and Matters Topic Paper at Sections 7, 8, 10, and C, and at Section 21 explains how the amount of land being proposed to be released is considered to be relatively modest.

**Contributor Reference:** 02150/1/001  
**Customer Name:** Mr Mohamed Ismail

### **Summary of representation:**

Supports the proposal:

- Proximity to A320 with good access to Woking station, hospital, M25 and Heathrow;
- Cost effective to incorporate all housing facilities on this large site;
- Ideal location between shopping areas and supermarkets e.g. Sheerwater Asda, Addlestone Tesco, Woking Town Centre, West Byfleet Waitrose;
- Benefit from close proximity to Horsell Common;
- Good, established infrastructure – roads, cycle routes, bus routes, pavements and paths;
- Proximity to large employers attractive to future occupiers, with reduced travel times to work and reduced burden on roads.

### **Officer Response:**

Support for the proposal is noted and the merits as set out in the representation will be weighed in considerations by Members.

It is acknowledged that the site has good accessibility to these main roads and motorways. However, it is possible that a site of this scale may have adverse impacts on existing traffic on these routes, which would need to be mitigated. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Accessibility to services and facilities was assessed in the Sustainability Appraisal of the site, and was found to be limited. Facilities are generally beyond reasonable walking distance, but within cycling distance. The canal acts as a barrier to easy access to Sheerwater. The need to travel to access existing services and facilities would be increased, although infrastructure improvements to cycling routes and for bus services may improve accessibility by sustainable modes of transport. There is also an opportunity to provide new local community services and facilities within the development.

Proximity to Horsell Common for beneficial recreational purposes is noted. However, the impacts on biodiversity of this protected area would need to be taken into account. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 02153/1/001

**Customer Name:** Miss F Allali

**Summary of representation:**

Objects to the proposal.

- Loss of Green Belt land, leading to urban sprawl – particularly with Fair Oaks proposal;
- Increased flood risk due to increased urban surface area and loss of trees;
- Pressure on existing roads, particularly A320;
- Lack of public transport;
- Stress on existing infrastructure and no plans for new infrastructure;
- Severe loss of wildlife;
- Loss of trees and woodland;
- Under the flight path;
- Recycling centre located in the middle of the site.

**Officer Response:**

Objections are noted.

All of these issues are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02156/1/001  
**Customer Name:** Aanisa Allali-Williams

**Summary of representation:**

Objects to the proposal.

- Loss of Green Belt land, leading to urban sprawl – particularly with Fair Oaks proposal;
- Increased flood risk due to increased urban surface area and loss of trees;
- Pressure on existing roads, particularly A320;
- Lack of public transport;
- Stress on existing infrastructure and no plans for new infrastructure;
- Severe loss of wildlife;
- Loss of trees and woodland;
- Under the flight path;
- Recycling centre located in the middle of the site.

**Officer Response:**

Objections are noted.

All of the issues are addressed in full in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02176/1/001  
**Customer Name:** Ms Annie Girotti

**Summary of representation:**

Objects to the proposal. Together with Broadoaks and Sheerwater developments there will be a cumulative adverse impact on services and traffic volume in West Byfleet, even with mitigation measures or proposals to build new facilities. Recent problems with Old Woking Road highlight the huge increase in traffic volume even before new developments have taken place. Wait to see what impacts the new developments have on the community before agreeing to further developments.

**Officer Response:**

The Council accepts that there are likely to be traffic implications of the proposal, including on the road network around West Byfleet. The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The transport studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

It should be noted that the site would be safeguarded for development between 2027 and 2040. This would therefore allow time for any development proposals at the current time to 'bed in', and the impacts of these developments (for example on traffic and infrastructure) can be taken into account in planning for development at safeguarded sites.

**Contributor Reference:** 02270/1/001  
**Customer Name:** Miss Aicha Allali

**Summary of representation:**

Objects to the proposal.

- Loss of Green Belt land, leading to urban sprawl – particularly with Fair Oaks proposal;
- Increased flood risk due to increased urban surface area and loss of trees;
- Pressure on existing roads, particularly A320;
- Lack of public transport;
- Stress on existing infrastructure and no plans for new infrastructure;
- Severe loss of wildlife;
- Loss of trees and woodland;
- Under the flight path;
- Recycling centre located in the middle of the site.

**Officer Response:**

Objection is noted.

All of the issues raised are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02188/1/001  
**Customer Name:** Mr Robert Jewkes

**Summary of representation:**

Support the Martyrs Lane proposal.

The site is large enough to accommodate 1200 homes, including affordable housing, Gypsy and Traveller accommodation and the necessary infrastructure such as shops, primary schools, health centres, etc. etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

It will simplify the process for obtaining planning permission.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus and cycle routes already exist. There is little development along the A320 so road widening if needed would be easy. The A320 to the south of Woking is already at capacity before the Hoe Valley School has opened.

The site has no national or local landscape designation unlike the other sites.

Most of the site is within Flood Zone 1 and will make the planning and development process simpler and more cost effective.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

Master planning of the total residential development would allow for the provision of Affordable Housing and specialist residential accommodation, something that the Council is currently under providing.

Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking. Currently, almost all other pitches are at the South West side of Woking. The site is in a sustainable location, close to services and facilities. It would comply with the requirements of CS14. Ten Acre Farm can therefore be removed from the Site Allocations DPD for traveller accommodation.

Due to the size of the site, it will be possible to meet all of Woking future housing and traveller needs on one site between 2017 and 2040 and beyond 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor along Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02937/1/001

**Customer Name:** Ms Linda Hucklesby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02164/1/001  
**Customer Name:** Michel Simonian

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02169/1/001  
**Customer Name:** Ms Jennifer Simonian

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02182/1/001  
**Customer Name:** Mr Kieron Woods

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02253/1/001

**Customer Name:** Jacquie Barry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02254/1/001  
**Customer Name:** Mr Gerrard Barry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02261/1/001  
**Customer Name:** Ms Nichola Barry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02200/1/001

**Customer Name:** R O Moore

**Summary of representation:**

Supports the proposal (although Surrey is already over-developed and the infrastructure is unable to cope with demand), excluding the golf course.

Planning permission has already been granted on the top part of the site, and includes previously developed land.

Part of the site is owned by Surrey County Council.

There is no public access to the land.

Public transport links are better.

Better access to the A320, leading to the M25 and Woking Town Centre.

**Officer Response:**

Support is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the

determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst some of the land within the site is publically owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. The land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land originally proposed offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02102/1/001

**Customer Name:** Mr Neil Cryer

**Summary of representation:**

Agrees to substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

The proposal will impact fewer nearby residents. Personal assessment demonstrates that there are 11.2 times more residents around the previous 6 identified sites than there are round Martyrs Lane.

The site is close to the existing road network such as the A320 and M25. It has better access to Woking town centre and the rail station than the other sites. The A320 has little development along it and road widening would be easy.

One compact housing development makes the provision of infrastructure easier and at less cost.

The site is close to major employers.

Part of the site has previously developed land and was granted planning permission for a McLaren Technology Centre.

The site could be used for Gypsy and Traveller accommodation.

The site is larger than the six other sites and could be used to meet housing need beyond 2040.

There are no national or local landscape designations. Some of the previously proposed sites have rising ground and escarpment designations.

The decision to build there will mean it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The

Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 at Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs

Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The suggestion that the Martyrs Lane site could be used for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

Regarding the representation relating to the size of the site, it is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this

recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02104/1/001  
**Customer Name:** Mr Gordon Denney

**Summary of representation:**

Supports the proposal at Martyrs Lane and objects to development in Pyrford.

Woodham is a residential neighbourhood with no centre or meeting place, there are very few facilities for the community and part of the area is badly in need of development.

The site would create economies of scale and provide opportunities for new community facilities including the provision of affordable housing and shops.

The original proposal can not make planning or economic sense.

**Officer Response:**

Objection to development in Pyrford and support for the Martyrs Lane proposal is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of new homes and facilities. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and in this particular regard, there are no perceived relative advantages over each other.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

**Contributor Reference:** 02110/2/001  
**Customer Name:** Mr Giles Blackham

**Summary of representation:**

Objects to the proposed safeguarding of Martyrs Lane for future development needs.

The majority of the site is Green Belt which limits urban sprawl. This development will result in urban sprawl.

The site also contains historic woodland and part of the SSSI within Horsell Common.

The development proposal is oversized and will led to a significant increase in road traffic on roads that are already near capacity.

Understands the need for new homes but these should be in smaller developments with less individual impact and on land that isn't either Green Belt or environmentally sensitive.

If you add this proposal to the Fair Oaks development this would result in 5000 new homes into a very small area of land which will have a significant impact on residents, wildlife and the environment. This is not acceptable.

**Officer Response:**

Objection to the proposed safeguarding of Martyrs Lane for future development needs is noted.

The representation relating to urban sprawl, Ancient Woodland and infrastructure and congestion has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Whilst it is recognised that the site is in close proximity to Horsell Common and its SSSI and Thames Basin Heaths Special Protection Area, it should be noted that the land is not covered by any absolute environmental constraints. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

In the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established in the Core Strategy and is consistent with national policy. The focus for consideration for the DPD should be about ensuring that the proposed allocations are the most sustainable when compared against all other reasonable alternatives. The representation relating to the impact of development on residents, wildlife and the environment are noted and will weigh in the balance of considerations by Members.

The Council is aware of the potential development at Fair Oaks in Surrey Heath. The council is working with Surrey Heath Borough Council as well as the County Council to identify the necessary infrastructure and mitigation measures needed to support the proposed developments. As part of the work the Council is undertaking, it is working in partnership with Surrey Heath Borough Council, Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of Longcross, Fair Oaks and Martyrs Lane.

**Contributor Reference:** 02112/1/001  
**Customer Name:** Mr David Harvey

**Summary of representation:**

The land to the east of Martyrs Lane is the best safeguarding option, excluding the New Zealand Golf Course.

The top part of the site was recently granted planning permission for a technology centre and some of this area is previously developed land, of which some is semi-derelict.

Much of the northern site has already been used for non-agricultural purposes and there is currently no public access to the land.

If a single site were chosen, the infrastructure needed with building new homes could be alleviated.

There is good public transport to the north of the site – not the case with the other six sites.

The road system to the north of the site is also good – the A320 to Woking and also access to the M25 in the other direction.

There are possible employment opportunities at St Peter's and the Animal & Plant Health Agency.

There would be less disruption to the residents of Woking with the choice of one site than by six individual sites.

Therefore support the consultation proposal as this will have the least impact on the borough and minimise disruption.

**Officer Response:**

Support for the Martyrs Lane site to be safeguarded for future development needs is noted. Whilst the representation expresses support to retain the New Zealand Golf Course, it should be noted that parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

Regarding the capacity of the site, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Based on the information from the other land owners within the site, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes without the Council using its Compulsory Purchase Powers to acquire land.

It is acknowledged that part of the site was granted planning permission for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst it is correct that the Martyrs Lane site is not used for agricultural purposes, the same can be said for the majority of the six original sites identified in the draft Site Allocations DPD. In addition, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarding options are classified as high quality agricultural land by DEFRA. In this particular regard, there are no perceived relative advantages over each other.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02089/1/001  
**Customer Name:** Mr Brian Dodd

**Summary of representation:**

The Green Belt sites in Pyrford have good transport services, a strong local community feeling, the recent approval of the Pyrford Neighbourhood Plan and good community assets including the schools and halls. However development would result in the loss of access to walking areas, increased traffic and that the community would be extended.

Martyrs Lane is big enough to create a new community and it has space for cycle tracks on both side of Guildford Road. However the roads are busy and development would increase traffic loads. It would also lead to the community being extended.

In favour of the Martyrs Lane site and object to Upshot Lane development.

**Officer Response:**

The merits of the land east of Martyrs Lane and the sites in Pyrford, as set out in the representation, are noted and will weigh in the balance of considerations by Members.

The comments relating to development in Pyrford, including the impact on amenity and well-being, traffic and congestion and the impact of development on the existing community, have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

In response to the representation regarding extending the existing communities at both Pyrford and Martyrs Lane, it should be noted that most of the housing need for the Borough is internally generated. Consequently it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that development of the site(s) would increase the population of the local area, however it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development.

The recently adopted Pyrford Neighbourhood Plan is now part of the Development Plan for the area. Any development proposals within the Neighbourhood Area would be assessed against the relevant policies of the Neighbourhood Plan in addition to the policies set out in the Core Strategy and Development Management Policies DPD.

Whilst a new community could be developed at the Martyrs Lane site, as set out above the Council has a number of policies and best practice guidance in place to ensure that any development proposal, regardless of location, should create a sense of place and be integrated with the surrounding area. This includes Policy CS21: Design and the Design SPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Overall support for Martyrs Lane is noted.

**Contributor Reference:** 02098/1/001  
**Customer Name:** Ms Lucy Grivvell

### **Summary of representation:**

Martyrs Lane is a previously developed site. Pyrford's unique semi-rural setting is largely unspoilt with open views to the south. The fields form part of the escarpment. The sites have been farmed for centuries and emphasise the distinctive character of the area highlighted in the Pyrford Neighbourhood Plan.

Martyrs Lane's 3 sites to the north of the golf course are almost unused, partly pre-developed and derelict. There is no landscape element, no known footpaths and the public seem not to use it. The site benefits on one.

Planning permission has been granted for a factory in the northern section of the site. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. Although never developed this demonstrates that its viability as a factory stands and the building of houses is a viable alternative option, based on the reasons given for the McLaren planning permission.

The land also includes a former army camp, disused sports field and general debris. The SCC Waste Site has 7ha of derelict land to the rear. Both sites have been offered for development for several years now.

The 3 sites to the north of the New Zealand Golf Course should have been prioritised by WBC in its initial Regulation 18 Consultation but seem to have been overlooked. It is unacceptable that the six original sites were in the DPD when the previous use and availability of the Martyrs Lane site is considered.

There has been confusion regarding the number of dwellings required to be safeguarded. Only 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in

Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

Pyrford Neighbourhood Plan states of this area that 'The area has one particularly ancient tract around the medieval St Nicholas' Church and the escarpment along Warren Lane and Church Hill. It is believed the area represents one of Surrey's last remaining examples of natural beauty, in a farming setting

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

#### **Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

The representations relating to heritage, local character, amenity and landscape have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

Regarding the representation on development viability, the Council through the preparation of the Core Strategy, Community Infrastructure Levy and Site Allocations DPD is confident that development at either of the proposed safeguarded options would achieve positive viability.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding

policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the

six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to

manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on the urban boundaries, the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unhelpful to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

**Contributor Reference:** 02067/1/001  
**Customer Name:** Mr Simon Gaskin

**Summary of representation:**

Objects to development in Pyrford and supports safeguarding of Martyrs Lane.

Martyrs Lane includes previously developed land in the Green Belt that includes disused army buildings and land recently approved planning permission for McLaren to build a technology centre. Also includes waste land currently owned by Surrey County Council.

Public access to the site is poor and much less amenity and heritage value than the other proposed sites.

A single site can be developed more economically and with less disruption to the population than six separate sites across the borough.

A single site will allow infrastructure services to be developed without the difficulties of having six separate sites across the borough.

**Officer Response:**

Objection to development in Pyrford and support for Martyrs Lane is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It should be noted that less than 1 per cent of the site area is within public ownership. Surrey County Council's land holdings include the existing Martyrs Lane Recycling Centre. Whilst the land to the rear of the Recycling Centre is designated by Surrey County Council as a Waste Safeguarded site, this land is not within the ownership of Surrey County Council.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by heritage constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition,

development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02074/1/001  
**Customer Name:** Mrs Janet Bagley

**Summary of representation:**

Support for the Martyrs Lane site.

Road access is convenient to Woking and the M25.

A single site would involve less disruption to the locality and be more economical.

The site benefits from public transport.

Part of the site is in public ownership therefore helping council tax payers.

The Pyrford site would involve major disruption to the road network.

Therefore favour the Martyrs Lane site and object to Pyrford sites.

**Officer Response:**

Support for the Martyrs Lane site and objection to the Pyrford sites is noted.

Whilst the Martyrs Lane site is adjacent to the A320 and A245, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to

exacerbate congestion on the A245 (Woodham Lane/Sheerwater/Parvis Road) and A320 (Chertsey Road/Guildford Road).

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Whilst some of the land within the site is publicly owned land, this makes up less than 1 per cent of the total site area and therefore does not make up a significant proportion of the site.

The representation relating to the traffic implications of safeguarding the Pyrford sites has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02078/1/001

**Customer Name:** Mr David Earl

**Summary of representation:**

Pyrford is a small village with a congested main road due to the various community and social infrastructure located along the road. Additional development will make the situation worse which is particularly dangerous at school drop off times.

The high price of land in Pyrford makes it unlikely that any affordable housing will be provided to meet the needs of young people and low paid workers.

The area is already overstretched and therefore objects to development in this area. Preference for more town centre housing or development of a single site at Martyrs Lane when the infrastructure is less likely to cause traffic chaos and there is room for new community services.

**Officer Response:**

The reasons outlined in the representation against development in Pyrford is noted. The matters relating to traffic and road infrastructure have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is

specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02082/2/001  
**Customer Name:** Ms Claire Turner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02088/1/001  
**Customer Name:** Mr Alec Ashley

**Summary of representation:**

Martyrs Lane would provide better access to the M25 and Woking via the A320. It can also provide the necessary infrastructure for a development of this size. Saunders Lane has very poor access and the A320 is already at capacity.

**Officer Response:**

Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 Chertsey Road/Guildford Road corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The reasons against development on Saunders Lane is noted. The representation regarding the existing road network in Mayford has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02091 /1 /001  
**Customer Name:** Mr Jon Badman

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 02092/1/001  
**Customer Name:** Ms Nadia Badman

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 02099/1/001  
**Customer Name:** Ms Catherine Yeo

**Summary of representation:**

Support the Martyrs Lane proposal.

The site is large enough to accommodate 1200 homes, including affordable housing, Gypsy and Traveller accommodation and the necessary infrastructure such as shops, primary schools, health centres, etc. etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones and it is easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

It will simplify the process for obtaining planning permission.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus and cycle routes already exist. There is little development along the A320 so road widening if needed would be easy. The A320 to the south of Woking is already at capacity before the Hoe Valley School has opened.

The site has no national or local landscape designation unlike the other sites.

Most of the site is within Flood Zone 1 and will make the planning and development process simpler and more cost effective.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren Technology Centre, therefore there is a presumption that the land is suitable for development.

Master planning of the total residential development would allow for the provision of Affordable Housing and specialist residential accommodation, something that the Council is currently under providing.

Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking. Currently, almost all other pitches are at the South West side of Woking. The site is in a sustainable location, close to services and facilities. It would comply with the requirements of CS14. Ten Acre Farm can therefore be removed from the Site Allocations DPD for traveller accommodation.

Due to the size of the site, it will be possible to meet all of Woking future housing and traveller needs on one site between 2017 and 2040 and beyond 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor along Chertsey Road and Guildford Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Based on the Council's evidence residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02107/1/001  
**Customer Name:** Ms Leigh Pitts

**Summary of representation:**

Understands that development in the local area is necessary.

Strongly opposed to development in Pyrford. Not only as they are a local resident but because the nature and character of the village will change forever. Pyrford has rural charm, with roads with no pavements that are narrow. There is a village feel which should be preserved. There is also a strong loyal community.

The existing infrastructure is at capacity. Further development in the village would change the face of Pyrford.

Woodham does not have the same merits, it is a town with no real centre, shops or facilities. It is characterised by the busy road which goes through it. It would benefit from the development of a central point and potential new community services and facilities. The road infrastructure is already in place. Building north of the New Zealand Golf Course would create a development with great links to major roads such as the M25 and M3, without having a detrimental impact on the local area, wildlife and community. It wouldn't change the character of Woodham to its detriment or spoil a rural setting. New local facilities would ease the pressure on the West Byfleet Health Centre and local schools.

Do not destroy Pyrford and its rural charm.

**Officer Response:**

Objection to development in Pyrford and support for the Martyrs Lane site is noted.

The Council has addressed the matters relating to development in Pyrford, including the impact of development on local character and the provision of infrastructure in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding the representation relating to the provision of infrastructure at Martyrs Lane, it should be noted that the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Whilst the representation notes that development could be accommodated in the land to the north of the New Zealand Golf Course, two parcels of land in this area had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) and were comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. In addition, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion on the A320 corridor towards the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regardless of the Council's preferred safeguarding option, the social and environmental implications of any future development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. There are also a number of biodiversity requirements that future development proposals would have to address such as Core Strategy Policy CS7: Biodiversity and nature conservation, which restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

Regarding the representation relating to the impact of development on the local character, as set out in the Regulation 18 consultation Issues and Matters Topic Paper, most of the housing

need for the Borough is internally generated and consequently it is envisaged that planning to meet that need should not undermine the overall social fabric of the area, regardless of where in the borough development takes place. The Core Strategy, Development Management Policies DPD and Design SPD include robust policies and guidance to make sure that the design of development will be to a high standard and sympathetic to the general character of the area. Whilst there is no doubt that development will increase the population of some areas or wards, through the provision of adequate infrastructure, its impact on social, environmental and infrastructure pressures should be minimised.

**Contributor Reference:** 02096/1/001  
**Customer Name:** Mr Ian Crockford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02101/1/001  
**Customer Name:** Mr Raymond Mulligan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02106/1/001  
**Customer Name:** Ms Madi Apthorpe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02109/1/001  
**Customer Name:** Ms Becky Voice

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02110/1/001  
**Customer Name:** Mr Giles Blackham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02113/1/001  
**Customer Name:** Ms Lisa Coleman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02072/1/001  
**Customer Name:** Mr Tony Healy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02075/1/001  
**Customer Name:** Mr Ernest Blattmann

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02077/1/001

**Customer Name:** Mr Vic Bhayro

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02080/1/001

**Customer Name:** Simon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02083/1/001  
**Customer Name:** Mr Rajesh Kishan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02085/1/001

**Customer Name:** Mr Thanya Mansfield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02087/1/001  
**Customer Name:** Mr Altaf Shaikh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02090/1/001  
**Customer Name:** Mr John Apthorpe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02094/1/001  
**Customer Name:** Mr Mike Hudson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02068/1/001  
**Customer Name:** Mr Alan Robinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02069/1/001  
**Customer Name:** Ms Paula Mundy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02071 /1 /001  
**Customer Name:** Ms Claire Woods

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00644/3/001  
**Customer Name:** Ms Amy Lambkin

**Summary of representation:**

Object to building on Pyrford Fields because this is already a heavily populated area and traffic congestion. There is so many other areas across Surrey that have more space and not as congested as this area. I do not believe the area can cope with any more building and this area is surrounded by Green belt that surely should be protected.

**Officer Response:**

Objection to building on Pyrford Green Belt is noted.

Regarding the issues raised in the representation about the Pyrford sites such as Green Belt status, infrastructure and increased population, these issues have been addressed in detail in the Regulation 18 consultations Issues and Matters Topic Paper; particularly in sections 1.0, 3.0 and 23.0.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 02063/1/001  
**Customer Name:** Lesley Perkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02045/1/001

**Customer Name:** Mr Ian Hall

**Summary of representation:**

Objects to building on Pyrford Green Belt and all Green Belt land due to its designation such as to enable people to enjoy the countryside and to stop the sprawl of developed areas merging into one another. However if it is essential that the council has to meet a certain housing target, then the proposed development at Martyrs Lane makes far more sense, as this will substitute 6 areas of development for one. The Green Belt area in Martyrs Lane is not readily accessible and has already been built on in places.

**Officer Response:**

Support of the proposal in favour of development at the Pyrford sites is noted.

The justification for the release of Green Belt land to meet the future housing needs of the Borough is set out in detail in Sections 1 and 2 of the Regulation 18 consultation Issues and Matters Topic Paper.

The Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- To check the unrestricted sprawl of large build up areas;
- To prevent neighbouring towns merging into one another; and
- To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt – including the merging of neighbouring towns – are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- Woking Green Belt review (2013) by Peter Brett Associates; and
- Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, the land to the east of Martyrs Lane is considered to be less suitable for removal from the Green Belt than the previously identified sites, in terms of contribution to the purposes of the Green Belt.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings, and some land that has been previously developed. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Despite containing previously developed land, the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 02051/1/001  
**Customer Name:** Mr Michael Cooke

**Summary of representation:**

The Martyrs Lane site is not only large enough for the 1,200 houses for period 2027–2040, but can also hold accommodate more houses and the necessary infrastructure such as shops, primary school and a health centre. This means that it provides a genuine long term answer to supplying housing land around Woking, even beyond 2040. The alternative six sites are located in areas where there is either no infrastructure or an overstretched infrastructure and thus the single site provides a solution that is more sustainable.

Having a single site will simplify the planning processes, allowing WBC's stretched resources to concentrate on a single large development.

Creation of a single estate/community allows measures to deal with the extra traffic to be contained. Sites GB10 and GB11 in particular would rely on the A320 south of Woking to deal with extra traffic. The A320 to the north of Woking, though busy, is not as congested. Widening this section of the A320 would be relatively easy and bring benefits to Woking as a whole. The Martyrs Lane site would also be well-positioned for access to the M25, providing good access to the road network outside the Borough.

In addition to the McLaren Technology Centre, residents from a new estate in Martyrs Lane would have rapid access both to Woking and to Chertsey. The six dispersed sites do not have easy access to employers north of Woking. This ready access to employment opportunities means that this is a more sustainable proposal.

Planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Although in the green belt, the site has no other national or local landscape designation unlike some of the other proposals. This particularly applies to site GB11 which is within the escarpment and rising ground of landscape importance and also contains Little Gorsewood, a grade II listed building.

With the Council's intention to redevelop Sheerwater, a decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater and a joined up approach taken to the provision of infrastructure.

With a single large site, the creation of a new community will be easier and the building work will cause less disruption than with the alternatives.

While opposed to building in the green belt in general, from the above I conclude that, given a need to safeguard land, the proposal to replace the six sites by a single one at Martyrs Lane is a sensible way forward.

#### **Officer Response:**

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to employment opportunities. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs, irrespective of whether it is north or south of the Borough. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios,

including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a

development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as the escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application. It is important to note, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The social and environmental implications of any proposed development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the

development management stage. In addition, the traffic implications of the proposal as well as the cumulative effect of development within the wider area will also be taken into consideration.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02052/1/001  
**Customer Name:** Mr Richard Ley

**Summary of representation:**

Opposed to any development on the Green Belt, if there is no alternative then prefers developing the Martyr's Lane site rather than Parcel 9 (Pyrford).

The two fields in Pyrford are defined in the Brett Woking Green Belt report as of very low suitability for development and indeed this category is described as land fundamental to the Green Belt. The report also considers the Pyrford site to be within the Major Environmental Constraint category and is protected by the Woking Core strategy CS24. Finally, the report concludes that the two fields have either little/no capacity for change or low capacity for change. The Pyrford site is bounded by small country roads and lanes and would require significant improvements in the local infrastructure, including utilities, medical and schooling facilities. All three primary schools in the West Byfleet/Pyrford area have recently undergone expansion to accommodate current child numbers; further expansion is probably beyond the capacity of each site. The Health Centre at West Byfleet is already full with three surgeries with little capacity to take further numbers.

In considering the Martyr's Lane site, it contains no local or national landscape designations and has already been partially developed with both military and civilian dwellings during WWII and subsequently. Thus, its loss to the Green Belt would be less severe than that of the Pyrford fields. It is adjacent to a major trunk road (A320) and the Surrey County Council traffic reports (Jan 2105 and Sept 2016) suggest that the development of the Martyr's Lane site would have far less impact on traffic conditions than the development of the other six sites. It is large enough to accommodate the necessary infrastructure developments.

WBC has estimated that 1024 new houses are needed (not 3,500 which is also widely reported) to satisfy the future housing requirements of Woking, This could be satisfied either by selecting all of the six smaller sites or just the larger Martyr's Lane site. It would appear to make economic (and social) sense to select one larger site rather than six smaller ones, especially as it is lower quality Green Belt land, able to accommodate the necessary infrastructure and is more accessible.

**Officer Response:**

Support for the Martyrs Lane site and opposition to building on the Pyrford site is noted.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes

shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites. Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst some of the land within the Martyrs Lane site contains existing structures and buildings, including sports facilities, agricultural buildings and residential properties, the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 02053/1/001  
**Customer Name:** Mr Roger Mitchell

**Summary of representation:**

One large site is preferable to six small sites which can only be sub-optimal. Disruption would be confined to one area. The road network around Martyrs Lane has more capacity than, for example, Saunders Lane which is narrow and constrained by traffic-light controlled railway bridges. The quality of Green Belt land in Martyrs Lane is not comparable to the Hook Heath escarpment. This would be a better use of golf club land of which there is an inordinate amount in the Borough.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure, including transport infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The potential impacts of the previously proposed sites on traffic around Saunders Lane has been addressed in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively

assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

New Zealand Golf Club has made a representation stating that the Golf Course land will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 02054/1/001  
**Customer Name:** Mr Robert Catt

**Summary of representation:**

The land is more suitable for development in that it has no special landscape designations unlike the previously proposed areas – much of the land is disused and poorly maintained and part of the land has already been subject to a successful planning application for its development by McLaren.

The road infrastructure North of Woking is better able to be adapted to support the development of this site rather than adding to the transport load in already heavily congested areas of South Woking – in particular to the massive traffic load to be taken on Egley Road when the new school/sports complex is completed.

As the area would form a single site, there is the opportunity to create a larger integrated single community with a single set of commercially viable infrastructure providing local facilities.

Local employers such as St Peters, McLaren are more accessible to the Martyrs Lane site, as is access to transport links such as M25, Heathrow and Woking railway station.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response

to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

**Contributor Reference:** 02057/1/001  
**Customer Name:** Mrs H K Cooke

**Summary of representation:**

If land is required during this period then this is a much better proposal than the fragmented approach involving six sites. There is sufficient land to accommodate houses and infrastructure, and thus create a new community. It will also not add to the pressure on Woking's already stretched infrastructure. With easy access to West Byfleet and the A320 to Woking and the M25, this is a more sustainable solution than the alternatives.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of transport, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02059/1/001  
**Customer Name:** Ms Amanda Turner

**Summary of representation:**

Objects to development of the fields in Upshot Lane/Aviary Road. Impact on traffic volume and local resources i.e. the local village school, the doctors and hospitals. Impact of development on landscape and community.

It would be better to build a 'mini-village' development in the Martyrs Lane area. It would be possible to put all the homes that need to be built in one location and build an infrastructure around it. It was done many years ago in Goldsworth Park. It would also mean that the traffic from these houses would be able to access both Woking and the M25 easier and more directly rather than impacting on the narrow/village type roads around Pyrford.

**Officer Response:**

In terms of the issues raised about the Pyrford site such as infrastructure, character and landscape these issues have already been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', please refer to section 1.0, 3.0, 7.0 and 23.0 for the Council's response.

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02060/1/001  
**Customer Name:** Ms Gloria Turner

**Summary of representation:**

Where houses have been knocked down and replaced by flats this has increased the number of cars on the road and park. The roads are narrow and are not built for the number of additional cars in the area. Long waiting times for doctors and hospital appointments.

Considers a single site to build new homes is better. The infrastructure can be built around the houses and there can be maybe a doctors surgery or a small primary school or nursery for the children. Development on the Pyrford Fields could impact on this semi rural community and services such as police and the council.

Supports the Martyrs Lane option and not the fields in Pyrford.

**Officer Response:**

Support for the Martyrs Lane site and objection to the Pyrford site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding health care provision has been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper'. It should be noted that the Council is working with the local Clinical Commissioning Groups (CCG's) to identify future healthcare needs and distribution across the Borough to support future development.

the impact of development in Pyrford on the semi-rural community has been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', in particular section 23.0.

**Contributor Reference:** 02064/1/001  
**Customer Name:** Ms Tamara Pearson

**Summary of representation:**

Concerns about the extra traffic and pressure that would be put upon an already very busy main road. No provisions made for any additional roads and it is expected that the A320 will be able to cope. However, does not want any new roads to be built across any green belt land. Also the additional noise and pollution associated with the additional amount of cars that will be using the road.

The loss of green belt land and all the affects this will have on wildlife in the area.

Schools and Doctors Surgery in the area are already at capacity. Infrastructure will be needed to support the site such as schools and Doctors surgery. One large site in any area would cause more problems than it would solve. To break it up into smaller sites would make it more manageable for local communities, existing schools, GP surgeries, and roads to absorb.

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The social and environmental implications of any proposed development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the development management stage. In addition, the traffic implications of the proposal as well as the cumulative effect of development within the wider area will also be taken into consideration. This has been addressed in further detail in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

In terms of wildlife, the land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The justification for the release of Green Belt land for the development has been fully addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', refer to section 1.0 for the Council's response.

**Contributor Reference:** 02065/1/001  
**Customer Name:** Mr Yusuf Sutlan

**Summary of representation:**

Additional pressure that would be put upon an already very busy main road A320, as well as all the additional noise and pollution that would be associated with all the extra vehicles using the road.

Loss of habitat to wildlife and the effects of loss of woodland to the local environment.

Loss of green belt land.

The additional pressure that we would be put upon schools and GP surgeries in the immediate area.

It would be better to split the development across the proposed sites in Pyrford, Byfleet and Mayford rather than build all the houses on one huge site.

**Officer Response:**

In terms of traffic, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The social and environmental implications of any proposed development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the development management stage. In addition, the traffic implications of the proposal as well as the cumulative effect of development within the wider area will also be taken into consideration. This has been addressed in further detail in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

In terms of wildlife, the land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. It is acknowledged that there is an Ancient Woodland towards the northern part of the site and this will be

protected as part of any development of the site if the land were to be safeguarded. The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The justification for the release of Green Belt land for the development has been fully addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', refer to section 1.0 for the Council's response.

**Contributor Reference:** 02038/1/001  
**Customer Name:** Ms Muriel Hemmings

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02041 /1 /001  
**Customer Name:** Ms Judith Canty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02042/1/001  
**Customer Name:** Ms Margaret Steer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02044/1/001

**Customer Name:** Mr W D Steer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02047/1/001  
**Customer Name:** Mr Darren Cooper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02048/1/001  
**Customer Name:** Ms Devina Ramchurn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02049/1/001  
**Customer Name:** Mr Ken Forsyth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00584/1/001  
**Customer Name:** Mr Jason Newman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02056/1/001  
**Customer Name:** Mr Sam Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02061/1/001  
**Customer Name:** Mr Roy Brewer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02040/1/001

**Customer Name:** Mr Bill Quain

**Summary of representation:**

Support the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford) to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 02667/1/001  
**Customer Name:** Mrs Margaret Windsor

**Summary of representation:**

Supports proposed development in Pyrford, and therefore objects to Martyrs Lane proposal.

There has been little or no provision to show support for the building of many new houses on the Pyrford fields. This development would encourage and benefit Pyrford village, and bring more trade to the few shops. We who have children have no right to be so selfish as to stop local development like the now well-established Pyrford Woods estate. It is not possible to keep preserving fields when they are not being used, when houses are badly needed for so many people.

Hopes it will soon be possible to see Pyrford Village expanded and become more lively.

**Officer Response:**

Support for the originally proposed sites in Pyrford is noted.

The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all factors relating to the sustainability of the sites in question, such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts. Whilst the merits of developing the land in Pyrford as put forward in the representation are noted, they could equally apply to developing land to the east of Martyrs Lane, for example, the ability to provide a significant number of dwellings that are so desperately needed by future generations.

**Contributor Reference:** 02120/1/001  
**Customer Name:** Ms Denise Weekes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02033/1/001  
**Customer Name:** Ms Susan North-Coombes

**Summary of representation:**

Objects as the proposal would have a serious impact on traffic on already over-burdened road network leading to the M25 and local hospital. Infrastructure would not cope with such a large increase in population – particularly schools. It would cause more problems rather than solve problems.

**Officer Response:**

Objection is noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses the issues put forward in the representation in detail, including on likely traffic impacts and infrastructure capacity.

**Contributor Reference:** 02036/1/001

**Customer Name:** J A R Cook

**Summary of representation:**

Objects to the proposal. The environmental impact at Martyrs Lane site would be greater than that at the sites in Pyrford. Considers that, subject to adequate perimeter landscape buffers and design, the two fields either side of Upshot Lane are suitable for housing development and could make a positive contribution to the extension of Pyrford Village.

Upshot Lane is narrow and could be improved with footpaths either side and better integrated with existing footpaths and cycleways to provide improved permeability. Impacts on flora and fauna here would be minimal as fields are low-grade agricultural land with tendency to aeolian erosion all summer, which is a local air quality pollution problem.

Some development at the north-east end of the Martyrs Lane site could be acceptable.

Carry out an EIA on all sites under consideration, funded by the site owners who have a real interest in the outcome.

**Officer Response:**

The merits of the proposal to safeguard land at the sites in Pyrford, rather than Martyrs Lane, are noted and will weigh in the balance of considerations by Members.

It should be noted that detailed ecological surveys are yet to be conducted for all the sites, so the full impacts on flora and fauna are yet to be fully assessed. This will be a key requirement for any development proposal coming forward. The Council will consult with relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage, as well as require applicants to carry out prior assessments of the site to provide information on species and habitats. This will ensure the effective avoidance and/or mitigation of any adverse impacts prior to the approval of development, irrespective of which sites are safeguarded.

The Town and Country Planning (Environmental Impact Assessment) Regulation 2011 – also known as the EIA Regulations – form part of the development management system in England and relate to certain types of development. They give planning authorities a means of ensuring that they can take account of the environmental implications of individual developments in their decisions on planning applications. The Council would expect an environmental statement to be submitted with any planning application for development coming forward on safeguarded sites – but the appropriate time to undertake such studies would be at the development management stage.

The evidence that the Council has gathered in support of the Site Allocations DPD preparation stage is sufficiently comprehensive, adequate, sufficient and robust enough to inform planning

judgements about the preferred sites in the DPD, including informing considerations about the likely environmental impacts of development at the preferred sites. See Section 8 of the Regulation 18 Consultation Issues and Matters Topic Paper for full details.

Support for some development at the north-east end of the Martyrs Lane site is noted. Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

**Contributor Reference:** 02037/1/001  
**Customer Name:** Ms Siobhan Osborn

**Summary of representation:**

Supports the proposal.

Is concerned about the overcrowding that will result from any development around West Byfleet / Pyrford area; the congestion on roads and pressure placed on overstretched doctors surgeries and schools.

**Officer Response:**

Support with concerns are noted.

In terms of likely traffic impacts:

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies conclude that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

In terms of infrastructure provision:

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. Work on the Infrastructure Delivery Plan is ongoing, and the Council is working with providers such as the Surrey County Council and Clinical Commissioning Groups to ensure that site allocation options will be supported by adequate infrastructure such as school places and doctor surgeries.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02043/1/001  
**Customer Name:** Nigel And Mary Williams

**Summary of representation:**

Supports the proposal but the New Zealand Golf Course should be excluded – the remainder of the site to the north may be capable of delivering the required housing.

**Officer Response:**

Support is noted.

However, the northern part of the site alone would not be able to accommodate all of the required dwellings. Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that

the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

**Contributor Reference:** 02066/1/001

**Customer Name:** H Mottaghi

**Summary of representation:**

Supports the proposal in favour of development on the fields in Pyrford.

**Officer Response:**

Support noted

**Contributor Reference:** 02084/1/001  
**Customer Name:** Ms Sarah Ross

**Summary of representation:**

Supports the proposal.

**Officer Response:**

Support noted

**Contributor Reference:** 02086/1/001

**Customer Name:** Mr Matt Brill

**Summary of representation:**

Objects to the proposal.

There is already too much pressure on existing roads, especially A320 and A245, which are in gridlock in rush hour.

Concerned about safety for resident cyclists and pedestrians at very busy junctions of A245 and B385; A320 and B3121, and at six crossroads roundabout.

**Officer Response:**

Objections are noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper provides a detailed response about the traffic implications of the proposal, including on the A320 and A245 and on safety concerns. Each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development, and to ensure safety is maintained, as per requirements in the Core Strategy and Development Management Policies DPD.

**Contributor Reference:** 02093/1/001  
**Customer Name:** Mr Gary Elson

**Summary of representation:**

Supports the proposal, but excluding the golf club.

**Officer Response:**

Support is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 02095/1/001  
**Customer Name:** Ruby Hastings

**Summary of representation:**

Supports the proposal. It is much better located – nearer the M25.

**Officer Response:**

Support is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02073/1/001  
**Customer Name:** Mr D Harrison

**Summary of representation:**

Supports the proposal if we absolutely must develop on greenfield sites. Preference is for brownfield sites in the Town Centre, using high rise and high density to achieve the volume of housing at an affordable price.

Martyrs Lane site has good accessibility to M25. We have grossly overcrowded roads in the whole area, so getting the additional traffic from any new housing on to the M25 from the area closest on to the M25 is of paramount importance and the best way to minimise extra traffic in the town and whole area.

It's a large site with sufficient space for infrastructure e.g. schools, GP surgeries, shops etc. Better than overstressing existing resources across the smaller original sites. The whole site can become a well-designed suburb.

Access roads can be improved.

There is space for Traveller pitches.

Better opportunity to provide low cost housing (e.g. for workers at St Peter's Hospital) and housing for the vulnerable.

Future residents will use Woking's train station and can approach it without the need to go through Victoria Arch which is a massive restriction to traffic flow.

Original sites have single tracks, one-way bridges, and are already heavily congested. Any increase in traffic will cause further congestion.

The principle of development has been established due to the planning permission for McLaren's factory – so the area must be a development area.

**Officer Response:**

Support is noted.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out a detailed response on the justification for releasing Green Belt land to meet future development needs (Sections 1 and 2), and at Section 11 describes how the Council has comprehensively assessed and prioritised brownfield sites for development. Several sites in the draft Site Allocations DPD will be appropriate for high-density development, and key requirements include the provision of affordable housing.

It is recognised that the Martyrs Lane site has good access to the M25. However, the Council needs to assess the impact that such a large-scale development might have on the transport network. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

Although future residents may avoid using Victoria Arch to access the railway station, it is likely that other traffic hotspots such as the A320 may be exacerbated instead. In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites. The Regulation 18 Consultation Issues and Matters Topic Paper addresses in detail the issue of traffic impacts at the six original sites at Sections 3, 20, D, F, U and particularly V (refers to Mayford's infrastructure).

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend

that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the land east of Martyrs Lane as set out in the representation with regards to infrastructure, affordable housing and proximity to St Peter's Hospital are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. Residential development at any of the safeguarded options should be able to meet the

Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

It is recognised that the site does not have a landscape designation in relation to the escarpment, but it is still designated as Green Belt land. The Council has carried out two assessments to evaluate the contribution that the land makes to the overall integrity of the Green Belt:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point. The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the

determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It should be noted that the functional floodplain had been considered an absolute constraint and sites within it had been ruled out for consideration as reasonable alternatives for the purposes of the DPD. The defined areas of the allocated sites where development will be required to be sited were all in Flood Zone 1, where development is encouraged. None of the previously identified sites would lead to development exposed to unacceptable level of flood risk. See Section 5 of 'Regulation 18 Consultation Issues and Matters Topic Paper' for more details.

**Contributor Reference:** 02076/1/001

**Customer Name:** Mrs D G Long

**Summary of representation:**

Supports the Martyrs Lane proposal excluding the New Zealand Golf Course. The land to the north of the site is capable of delivering the required housing.

A new 'village' could be constructed providing new infrastructure and facilities. The original sites' infrastructure is overloaded. One site offers better economies of scale and provides a better infrastructure solution.

The site has better accessibility. The lanes in Pyrford, Byfleet and Mayford are unsuitable for increased traffic. The A245 through West Byfleet and over the M25 bridge has no capacity left, especially when taking into account other local development.

The Martyrs Lane site is on Green Belt land, some of which has already been previously developed. This is not true of the other three sites.

Amenity value – Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from across the borough.

Heritage – The Pyrford site includes a number of Heritage features including the Grade II listed Pyrford Court estate, Pyrford Village Conservation Area, Pyrford Common – designated as a Site of Nature Conservation Interest, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of this area.

Landscape – Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.

Agriculture – The Pyrford fields have been farmed for centuries. They make an important contribution to the rural character of the area and provide an important setting for the southern approach to the town.

**Officer Response:**

Support for the proposal is noted.

A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

In terms of avoiding developing the Golf Course:

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use

except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

In terms of delivering infrastructure:

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. The Council will, however, make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. The Council continues to work with key infrastructure providers to assess existing capacity at proposed site areas, and to plan new infrastructure where required.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of traffic:

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);

- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

The Regulation 18 Consultation Issues and Matters Topic Paper provides a detailed response to the issue of traffic impacts at the originally proposed sites – see Sections 3, 20, D, F, U and V.

In terms of previously developed land:

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material

considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

In terms of heritage and amenity and landscape value:

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features and locally valued landscape features such as footpaths within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage and landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are situated. The representations relating to heritage, local character, amenity and landscape have been further addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

In terms of agriculture:

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter. The contribution of the Pyrford fields to rural character is noted. However, the Green Belt boundary review took into account the landscape character and sensitivity to change of developing the parcels of land assessed. In combination with a number of other evidence base studies, such as the Sustainability Appraisal, the sites in Pyrford were selected as the overall integrity of the Green Belt would not be undermined, and they were considered to represent the most sustainable option.

**Contributor Reference:** 02097/1/001  
**Customer Name:** Mr Robert Munford

**Summary of representation:**

Supports the proposal.

The two fields in Pyrford have been farmed for centuries. They have never been built on. They are an essential component of Pyrford, providing the rural landscape essential to the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The stated objective of the plan is to 'maintain and enhance the area's distinctive and special rural and residential character.'

Pyrford's green belt field are a contributing asset and are used to produce farm crops for either animal feed or bio fuels whereas the Martyrs Lane Land has no current use at all.

Any changes will impact the lovely village of Pyrford and also increase traffic in the area.

I also believe that the infrastructure such as: Sewage, Water, Electricity, etc. would need significant upgrades to support any new houses and people.

By contrast in 2012 planning permission was granted for a 60,000 square foot factory in the northern portion of the site. This permission was revoked at the request of McLaren. Mr Freeland, an experienced planning officer in the council, considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl.

There are three large employers close by the Martyrs Lane site – McLaren, Animal & Plant Health Agency and St Peter's Hospital. The latter needs affordable housing for its employees who work shifts and bus 446 passes Martyrs Lane to the hospital.

**Officer Response:**

Support is noted.

The Council is aware of the objectives and policies in the Pyrford Neighbourhood Plan, which now forms part of the Development Plan for the area.

In terms of the representation on landscape: the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect

of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Development Plan for Woking includes robust policies to protect landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies (particularly in terms of design of development) to make sure that their development does not compromise valued landscape assets or the character of the area. Further detail is given in Regulation 18 Issues and Matters Topic Paper at Sections 7 and 23.

The Topic Paper also provides a detailed response on the traffic and infrastructure implications of developing the original sites, at Sections 3, 20 and 24.

In terms of the principle of development at the Martyrs Lane site: it is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being

considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entirely different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

In terms of affordable housing and local employers: it is accepted that the land east of Martyrs Lane is in close proximity to major employers, whose employees would benefit from affordable housing. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their location and land values. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02972/1/001  
**Customer Name:** Mr Richard Wilson

**Summary of representation:**

Objects to the proposal due to:

Loss of Green Belt leading to urban sprawl, especially in combination with Fair Oaks proposal.

Increased traffic on A320 and A245, exacerbating the health hazard to residents.

Overcrowding at Woking Station – already one of the busiest in the UK.

Lack of infrastructure planned to support such a large development e.g. schools. It would only serve to increase congestion and lower quality of life generally.

Better alternative options e.g. land around Worplesdon Station, to include retail and office development. The new school nearby could serve residents.

The Martyrs Lane proposal is outrageous given alternative better locations and health risks that development here could bring.

**Officer Response:**

Objection is noted.

Many of the issues raised in the consultation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, including impacts on the integrity of the Green Belt; traffic impacts – particularly on the A320 and A245; and infrastructure provision (including public transport such as trains).

Areas around Worplesdon Station (as well as across the whole Borough) were assessed as part of the Green Belt boundary review – identified as parcels 16 and 17. Much of the area contains constraints to development, including land designated as Flood Zone 3, and as Site of Special Scientific Interest. The report found there was little scope to accommodate significant development without substantial adverse effects on landscape character. Following completion of the Green Belt and Sustainability Assessments, these parcels were not recommended for removal from the Green Belt. Full details can be found in the Peter Brett Report.

**Contributor Reference:** 02111/1/001  
**Customer Name:** Mr David Crowder

**Summary of representation:**

Supports the proposal but avoiding the Golf Course.

There would be less traffic disruption and overstretching of local services than that caused by building around Upshot Lane. Agrees with views expressed by Pyrford Neighbourhood Forum.

**Officer Response:**

Support noted.

Regarding the New Zealand Golf Course: as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Regarding traffic impacts:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding infrastructure provision:

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. The Council continues

to work with infrastructure providers such as Surrey County Council and the Clinical Commissioning Groups to determine the capacity of existing infrastructure to accommodate future growth in the Borough, and to plan for new infrastructure where needed.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council have received a representation from Pyrford Neighbourhood Forum and the Council's response can be accessed for further information.

**Contributor Reference:** 02114/1/001  
**Customer Name:** Ms Susan Hobbs

**Summary of representation:**

Supports the proposal.

Large enough site to accommodate 1200 houses including affordable housing and Traveller pitches. Makes more sense to accommodate housing need in one place than dispersed across the Borough. There will also be space for shops, school, health centre etc.

Good access to M25 via A320, which would be easier to widen. This is better than exacerbating traffic to the south of Woking, which is already terrible (and will be worse once Hoe Valley school opens).

Close to major employers – a new neighbourhood would provide employment opportunities.

Clear of flood zone constraints.

Will help meet affordable and specialist residential housing requirements, and build all the houses necessary to fulfil Woking's housing and Traveller needs. Ten Acre Traveller Site proposal could be removed, and open up the East of Woking to Travellers.

**Officer Response:**

Support is noted. The merits as set out in the representation will weigh in the balance of considerations by Members.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using

its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of

development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

As set out in detail in Section 5 of the Regulation 18 Consultation Issues and Matters Topic Paper, the defined areas of the allocated sites where development will be required to be sited

are all in Flood Zone 1, where development is encouraged. There are therefore no advantages regarding flood risk associated with the Martyrs Lane site over the original proposed sites.

The merits of the Martyrs Lane site for affordable housing, specialist housing and Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 02115/1/001  
**Customer Name:** Lesley Godbolt

**Summary of representation:**

Supports the proposal, particularly over the sites in Pyrford.

The road infrastructure around Martyrs Lane are wider and newer and can cope with increased traffic, versus the narrow, windy roads in Pyrford, where there would be an increase in accidents.

Pyrford has more heritage assets, which need to be taken into account as per NPPF rules. A new housing estate will inevitably block views and ruin heritage settings. Heavy traffic will also affect them with vibrations and pollution. A large estate will ruin the setting forever.

The bus services in Pyrford cannot cope with increased traffic and population.

The infrastructure in Pyrford does not have capacity for increase in traffic and population, versus the Martyrs Lane site where there is room to build new infrastructure.

Good access to M25.

There are many golf courses in the Borough, and we can spare the loss of New Zealand Golf Course.

**Officer Response:**

Support is noted. The merits of the proposal as set out in the representation will weigh in the balance of considerations by Members.

With regards to traffic impacts:

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

With regards to heritage assets:

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD include robust policies to protect heritage features and locally valued landscape features such as footpaths within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage and landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are

situated. The adopted Pyrford Neighbourhood Plan will also add to this pool of planning policies which protect the heritage and landscape assets of the area.

With regards to public transport and other infrastructure:

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

In relation to bus services in Pyrford, new development coming forward at this location provides an opportunity to improve existing infrastructure, or provide new infrastructure. This could include the provision of better bus services or public transport routes such as cycle lanes and footpaths. The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Whilst there are a number of Golf Clubs in Woking, the loss of a sports and recreation facility would still have to be considered against the relevant policies of the Core Strategy. This is a matter that will be carefully considered by members in making their decision on the Council preferred safeguarding option.

**Contributor Reference:** 02116/1/001  
**Customer Name:** Mr Richard Davidson

**Summary of representation:**

Strongly supports the proposal.

Good economies of scale related to the use of one site to meet housing requirement, and provision of infrastructure such as water, waste and electricity. Easier to provide facilities such as a school and health centre.

Three of the areas within the site are not in use and are overgrown woodland. Planning permission has previously been granted and they have been used for dwellings in the past.

Opportunity to secure affordable housing, employment, infrastructure and minimise traffic in original sites' areas.

Martyrs Lane represents the option with the lowest overall negative impacts and the greatest positive impacts.

**Officer Response:**

Support is noted and the merits of the proposal as set out in the representation will weigh in the balance of considerations by Members.

It is recognised that there may be economies of scale in relation to infrastructure provision. However, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings, and unused areas. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The conclusions of two studies assessing the landscape and Green Belt contribution of this area of land concluded that development of this site would lead to urban sprawl and an incursion into the Green Belt. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02118/1/001  
**Customer Name:** Mr Paul Cozens

**Summary of representation:**

Objects to proposals to build on the Green Belt in Woking; but if any Green Belt development is absolutely essential and completely unavoidable then Martyrs Lane is more appropriate than the original six sites that were proposed.

The Green Belt is a vital part of the environment and highly valued by residents. Majority of residents do not support building on the Green Belt and strongly disagree with the Council's approach. The Conservative Council should respect the Conservative Government which emphasises the protection of the Green Belt from development.

The Council should prioritise development on previously developed land. A full and proper review of brownfield/empty and underused buildings has not been carried out. This should happen before commissioning consultants to review the Green Belt. The Council seems to be directing most of its efforts to selecting Green Belt sites. Any Green Belt review should only take place once all brownfield land is exhausted and no empty properties remain.

The Council should not be attempting long term housing need forecasts due to the uncertainty of future housing needs, the economy and fluctuating immigration levels. Even short term projections could prove inaccurate. Only a ten-year plan is needed, with a five-year rolling supply. Longer term projects should be paused until the effects of Brexit are more certain. Site allocations beyond 2027 are not appropriate and unnecessary.

Proposals are stating numbers far in excess of 550 houses that is stated need to be on Green Belt land. West Hall alone has this capacity. There should be no need for Green Belt land if other areas are properly addressed.

Concerned about the process leading to permission to release a degree of Green Belt land. Was unaware of previous consultations regarding this, including any publicity about it. Explain which processes took place and how. This needs impartial and independent scrutiny.

The original Byfleet sites are inappropriate because:

1. In previous reviews Byfleet has been identified as inappropriate for any further major development;
2. Flooding issues, expounded by the only means of exit being via Parvis Road, which is congested and close to maximum permitted pollution levels;
3. Limited size and capacity for housing given the constraints from the floodplain and water;
4. The sites border floodplains, and the vegetation therefore plays a vital role in reducing groundwater levels – removal of trees will increase pressure on the floodplains. Environment Agency has identified the Sanway area of Byfleet as at very high risk of flooding.
5. The availability of land (as the landowner is willing to sell) has been prioritised over and above the sustainability of the land;

6. The Byfleet Petition should be given more weight given the size of the response;
7. Together with West Byfleet and Pyrford sites, there is an overconcentration of development in this area (putting pressure on local infrastructure such as roads, schools and GPs) and loss of Green Belt in one general region.

Concern about lack of infrastructure and funding of infrastructure to support the level of housing required.

Broadoaks in West Byfleet as a previously developed site is a reasonable location for some level of development. If all brownfield sites and empty buildings are exhausted, and all the above points have been fully addressed, Martyrs Lane is more suitable than original six sites. However, the level of development should be minimised and maximum green space retained. There are also open spaces in the surrounding areas, whereas this is not really the case with the original sites. Martyrs Lane allows access and exit on to different areas rather than concentrating traffic on just one road. Traffic issues may be mitigated by greater access to the north and south of the site, and avoid all traffic being concentrated onto one small area, unlike the original sites. Martyrs Lane does not have flood issues.

Strongly objects to large-scale development in Byfleet or loss of Byfleet green spaces.

**Officer Response:**

The objections to development on Green Belt land are noted; as is support for the proposal to substitute the six original sites with one site at Martyrs Lane if unavoidable.

The Council agrees that the Green Belt is a vital part of Woking's environment and is highly valued by residents. In response to the Regulation 18 consultation on the draft Site Allocations DPD, the Council prepared an Issues and Matters Topic Paper (available on the Council's website) which addresses many of the issues raised in the representation in detail, including:

- the justification around releasing Green Belt land to meet future development needs of Woking beyond 2027 (i.e. over and above the 550 new homes required between 2022–2027), and how the approach was reached in line with the National Planning Policy Framework issued by the Government, and in line with the Government's commitment to housing delivery (Sections 1 and 2);
- why it is necessary to safeguard sites for development beyond 2027 (Section 2);
- how the Council has conducted a full review of brownfield sites, including empty buildings, in advance of identifying Green Belt sites (Sections 1, 11 and 16) and how all reasonable alternatives have been considered (Section 9);
- how the decision was reached to permit the release of Green Belt land by the independent and impartial Core Strategy Examination Inspector (paragraph 1.6–1.12).

The Inspector recommended the release of Green Belt land for housing development at the Core Strategy Examination. The Core Strategy was prepared over a number of years, and went through various stages of production, including several rounds of consultation on the draft document (in 2009, 2010, and 2011) and an Examination in Public took place over five days in

March and April 2012. The Council was concerned to ensure that public involvement was central to the Core Strategy preparation process, and took into account comments received at each consultation stage. The Inspector concluded that the Core Strategy had been prepared in accordance with Woking's Statement of Community Involvement, and all relevant regulations dictating consultation requirements.

The issues concerning the specific Byfleet sites have been addressed as part of the Regulation 18 consultation process, and further details can be found in the Issues and Matters Topic Paper, particularly:

- Section 5 setting out how flood risk has been assessed;
- Section 13 on how the ownership status of land has no bearing on whether it is released from the Green Belt;
- Section L on how the allocation of sites for development is not evenly spread across the Borough;
- Sections 3 and M on how existing infrastructure has been assessed;
- Section T on how the Byfleet petition has been taken into account.
- Section 3, 20, V and U on how the developments will impact on local transport networks.

Land at Broadoaks, Parvis Road, was allocated for development in the draft Site Allocations DPD and this remains the case. This is not one of the sites being consulted on in this particular exercise. The merits of the Martyrs Lane site as set out in the representation are noted and will weigh in the balance of considerations by Members.

**Contributor Reference:** 02119/1/001  
**Customer Name:** Ms Wendy Quintal

**Summary of representation:**

Supports the proposal. It will provide greater economy of scale to address the many infrastructure issues concerning the original six sites, as well as incorporating community services such as health centres and schools.

**Officer Response:**

The merits of the proposal as set out in the representation are noted and will weigh in considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02122/1/001  
**Customer Name:** Shereen Hussein

**Summary of representation:**

Supports the proposal.

The site is large enough to accommodate 1200 houses including affordable housing, along with the necessary infrastructure required. Housing in one location can be served by the same new services e.g. doctors' surgery, school etc. New residents are unlikely therefore to put pressure on existing facilities.

Good proximity to motorways and to Woking Train Station. Good bus and cycle routes to detract from using cars, and to access employment and education facilities.

Good employment opportunities nearby e.g. St Peter's Hospital, McLaren, Woking Town Centre, West Byfleet Town Centre.

**Officer Response:**

Support is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Accessibility to the M25 and to the Town Centre is noted, although there will be traffic implications along the connecting roads that will need to be mitigated. The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots, such as the A320. The Regulation 18 Issues and Matters Topic Paper sets out a detailed response (under paragraph 3) to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the

A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless, policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. The six other sites as demonstrated in the Officers' response to the Regulation 18 Consultation also meet the policy CS1 test to some degree.

**Contributor Reference:** 02125/1/001  
**Customer Name:** Ms Maryam Mirghaemi

**Summary of representation:**

Objects due to:

- 1- Heavy traffic on existing roads
- 2- Loss of trees and woodland
- 3- Loss of Green belt
- 4- Lack of public transport
- 5- Pressure on the hospitals in the area
- 6- Impact on wildlife

**Officer Response:**

Objection is noted.

The Woodham and Horsell Neighbourhood Forum Issues and Topic Paper addresses in detail the points raised in the representation, including traffic implications, impact on landscape and wildlife, impact of loss of Green Belt, and public transport provision. It also sets out how the Council ensures that development is supported by the necessary social, physical and green infrastructure. This includes health infrastructure – the Council is updating its Infrastructure Delivery Plan and is working with the Clinical Commissioning Groups to determine how the capacity of local health facilities – such as St Peter's Hospital – may be affected by future development. This work is ongoing.

**Contributor Reference:** 02130/1/001  
**Customer Name:** Mr James Snelgrove

**Summary of representation:**

Supports the proposal (although ideally no Green Belt land would be used).

Certain Members of the Council have bowed to the pressure of Burhill Estates who have been trying to sell the fields in Pyrford for decades, and pushed the fields to the top of the list for removal from the Green Belt. This is despite an independent report declaring these fields are the least suitable in the area to be built on. Decisions are financially motivated. The files for Martyrs Lane were hidden and should have been considered initially.

Green Belt land in Pyrford is actively used by walkers, runners, cyclists etc and has beautiful views over the Surrey Hills. This is not the case at the Martyrs Lane site.

Significant new development proposals in the Pyrford and West Byfleet areas will put a strain on existing infrastructure, without a further population increase.

Parts of the Martyrs Lane site are previously developed.

One site will allow economies of scale with infrastructure provision (roads, schools, doctor surgeries etc).

The New Zealand Golf Course does not need to be built on.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The decision to safeguard particular sites in the draft Site Allocations DPD is well evidenced. Section 10 of the Regulation 18 Consultation Issues and Matters Topic Paper provides a detailed account of the Green Belt boundary review procedure, and how the Members of the Local Development Framework Working Group were satisfied it had been prepared in accordance with the brief, and that it provides useful evidence to inform the DPD.

The Peter Brett report did actually recommend that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the

exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Officers did in fact consider parts of the Martyrs Lane site in the early stages of DPD preparation. Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. As noted above, the Green Belt boundary review, as well as the landscape assessment conducted by Hankinson Duckett, concluded that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

In 2016, a change in circumstances relating to planning approval at the McLaren site west of the A320 prompted Members to reconsider land to the east of Martyrs Lane as an alternative site for future development. The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. Detailed reasons were put forward by Members of the LDF Working Group, and are available on the Council's website. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all

reasonable options have been assessed. The conditions attached to the latest planning approval at the McLaren site west of the A320 (PLAN/2014/1297) presented a change in circumstance to justify the Martyrs Lane consultation. Representations received during the consultation will provide useful information to inform Members on their preferred approach to safeguarding.

The Council recognises that there may be economies of scale in providing certain infrastructure. However, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect locally valued landscape features such as footpaths within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are situated.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Regarding the New Zealand Golf Course in the proposal: as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 02133/1/001  
**Customer Name:** Mr David Bailey

### **Summary of representation:**

Supports the proposal in favour of development in Pyrford:

- Upshot Lane fields are useful long term farmland and contribute to the areas distinctive character and landscape.
- Green Belt report said that Parcel 9 has very low suitability for removal from the Green Belt, and shows 'major environmental constraint'.
- The Martyrs Lane site will provide greater potential for further expansion than Pyrford, which is more prone to suffer overcrowding and severe congestion.
- The Green Belt land in Pyrford provides well used facilities for walkers, joggers and cyclists.
- Land values are higher in the Pyrford area compared with Martyrs Lane, thus the latter will make the provision of low cost housing more viable, providing homes for essential local workers.
- The area North of the NZ Golf club is partly derelict, it has had deserted Army buildings and junk on it for many years.
- Senior WBC planners have no concerns that development of the Martyrs Lane site will harm the Green Belt.
- It does not seem that the golf course needs to be included in the development, in any event the land generally is under Minor Environmental Constraint.
- The Martyrs Lane site is in a better location for the provision of suitable infrastructure, that could include healthcare and educational facilities. Those in the Pyrford area are currently overstretched.
- It also likely to add less to traffic congestion than the Pyrford site.

### **Officer Response:**

Support is noted.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites, including those in Pyrford, are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation (i.e. the constraints and landscape quality). Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. It is therefore not correct to assume that Officers believe that development at Martyrs Lane will not harm the Green Belt.

If developed in the future, the Martyrs Lane site will in fact have limited potential for further expansion due to environmental constraints e.g. the floodplain to the north of the site, the presence of Horsell Common SPA and SSSI to the west of the site, and an SNCI to the east of the site. Land surrounding the site would also remain in the Green Belt, which would limit the possibility of further development.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. In addition, the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to

assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02039/1/001  
**Customer Name:** Yolande Milborrow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02046/1/001  
**Customer Name:** Michelle Beman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02050/1/001  
**Customer Name:** Vivienne Amer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02058/1/001  
**Customer Name:** Meenaxi Sharma

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02034/1/001  
**Customer Name:** Ms Emma Wallis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02035/1/001

**Customer Name:** Jamie Hunt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02127/1/001  
**Customer Name:** Ms Ann Corbett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02138/1/001  
**Customer Name:** Ms Annabella Wakefield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02148/1/001  
**Customer Name:** Ms Zoe Gardner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00433/2/001

**Customer Name:** J T Lyddon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02070/1/001

**Customer Name:** J Barber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02079/1/001  
**Customer Name:** Mr Norman A Pealing

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02081/1/001  
**Customer Name:** Ms Wendy A Parkes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02100/1/001

**Customer Name:** Elna Broe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02105/1/001  
**Customer Name:** Mr Steve Lawrence

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02108/1/001  
**Customer Name:** Mr Michael D Cosgrove

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01749/1/001  
**Customer Name:** Mr John Bradbury

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02117/1/001  
**Customer Name:** Ms Joanne Coady

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02936/1/001  
**Customer Name:** Mr Jonathan Coady

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02062/1/001  
**Customer Name:** Elmbridge Borough Council

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 02652/1/001

**Customer Name:** N Harding

**Summary of representation:**

Supports the proposal.

Parts have been previously developed, unlike originally proposed sites;

Good access to A320 and M25, which offers better opportunity to improve road access than the already congested A245;

Economies of scale regarding infrastructure provision through the use of one larger site;

Green Belt land in Pyrford has high amenity value, being accessed by walkers, runners and cyclists;

The fields in Pyrford are material to the setting of the area and its heritage value and rural character, and an important boundary and setting for the southern approach to the Woking area;

Pyrford's fields have been farmed for centuries and include good quality agricultural land, and are protected by policy CS24.

**Officer Response:**

Support for the proposal is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Whilst the Martyrs Lane site has good access to main roads, the traffic impacts of such a proposal need to be considered. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

The merits of the proposal as put forward in the representation are noted and will weigh in the balance of considerations by Members. Nevertheless, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage and landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage or landscape assets of the area.

Design policies of the Development Plan for the area would require development proposals to take into account the surrounding features of the area that are valued by local residents.

Whilst the Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites, including those in Pyrford, are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter. The Council appreciates that the fields in Pyrford are valued by its local residents for the part they play in contributing to the rural character of the area, but the Green Belt review took these issues into account when coming to its recommendations.

The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The representations on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02032/1/001  
**Customer Name:** Domenico Digilio

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02653/1/001  
**Customer Name:** Mr Ron Dawes

**Summary of representation:**

Supports the proposal.

The site is large enough to accommodate 1200 houses, including affordable housing, and the necessary infrastructure of shops, primary schools, health centre, etc. It is much easier to create the associated infrastructure rather than overloading existing over-stretched facilities.

It will simplify the process for obtaining planning permission.

The A320 gives easy access to the M25 and Heathrow Airport to the north, and to Woking town centre and the mainline railway station to the south without encountering the traffic delays where roads cross railway lines. Bus routes and cycle routes, including to Woking town centre, exist already. This is a better proposal than the option of building south of Woking where the A320 is often at a standstill in the morning rush-hour and that is before the new Hoe Valley School has opened.

Suitable to accommodate one or more Gypsy and Traveller sites, to replace Ten Acres. This would allow Travellers to live East of Woking. Almost all other pitches are at the South West side of the Borough. Any Traveller site would satisfy the Council's Core Strategy (2012), CS14, Gypsy and Traveller pitch criteria.

Although in the green belt, the site has no other national or local landscape designation unlike Mayford and Pyrford sites.

Most of the site is clear of Flood Zone 2 and 3.

Much of the land is disused and derelict.

Planning permission has been granted previously, resulting in a presumption for development.

Would provide accommodate for employees of nearby major employers. A new neighbourhood centre here would also create new employment opportunities.

It is large enough to meet all the housing needs of the Borough up to 2040, but also well beyond the 2040 period.

**Officer Response:**

Support is noted.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes (nor any additional homes required beyond 2040). For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst development at the Martyrs Lane site would be directed to Flood Zone 1 land, this is also true of the originally proposed sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a

development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree. The merits of the possibility of providing a new neighbourhood centre are noted, and will weigh in the considerations by Members.

**Contributor Reference:** 03023/1/001  
**Customer Name:** Mr Graham Foat

**Summary of representation:**

The land has been used during WW2 as temporary housing and has sport facilities on site. This land should be strongly considered as this brownfield site should be used before greenfield land. It could be considered for housing development before 2027.

**Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered.

The Council notes the landowners support for the site to be released from the Green Belt for housing development before 2027. At this stage of the process, the Council has identified a suitable amount of land to meet the development needs of the borough up to 2027. These sites are set out in the draft Site Allocations DPD. The purpose of this consultation is to inform the Council's decision on its preferred safeguarding option to meet future development needs between 2027 and 2040. The landowners support and the availability of the site for development will inform the Council's final decision in preparing the Site Allocations DPD for Regulation 19 consultation.

**Contributor Reference:** 02016/1/001  
**Customer Name:** The Woodland Trust

**Summary of representation:**

The Woodland Trust is the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

The Trust is concerned about a site allocation included in the Woking Borough Council Site Allocations DPD as it could lead to the damage and loss of ancient woodland.

National Planning Policy Framework (NPPF) paragraph 118 states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

Natural England's standing advice for Ancient Woodland and Veteran Trees<sup>1</sup> states:

"Trees and woodland classed as 'ancient' or 'veteran' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes."

The Housing White Paper published on 7th February 2017 further shows the government's intent to improve planning protections for ancient woodland. This revised protection reinforces the approach set out in paragraph 118 (as set out above) to restrict development of ancient woodland as to do so would be contrary to the National Planning Policy Framework presumption in favour of sustainable development (as set out in paragraph 14).

Section 40 of the Natural Environment and Rural Communities Act 2006 requires all public authorities (including LPAs), in exercising their functions to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas. Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. Majorly adverse impacts would occur as a result of the removal of large areas of woodland, much of which contains high quality, valuable trees, to make way for the construction of this proposal.

When land use is changed to a more intensive use such as in this situation plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These detrimental edge effects can result in changes to the environmental conditions within the woodland and consequently affecting the wood's stable conditions. Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges.

Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging edge effects, serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use in the intervening matrix between ancient woods.

Natural England's standing advice for Ancient Woodland and Veteran Trees states:

"Impacts of development nearby can include these effects on the trees and woodland, and the species they support:

- o compacting the soil around tree roots
- o breaking up or destroying connections between woodland and other habitats
- o reducing the amount of semi-natural habitats (like parks) next to ancient woodland
- o changing the water table or drainage
- o increasing the amount of pollution, including dust
- o increasing disturbance to wildlife from additional traffic and visitors
- o increasing light pollution
- o increasing damaging activities like fly tipping and the impact of domestic pets
- o changing the landscape character of the area."

Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and Natural England recommend "leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland or tree (depending on the size of development, a minimum buffer should be at least 15 metres)."

The size of a number of the site allocations suggests that large scale development could potentially take place. The minimum 15m buffer recommendation to all development is not effective in ensuring that ancient woodland within and/or adjacent to site allocations is not affected by potential future development. Buffers should be constructed on a case-by-case basis rather than a 'one size fits all' approach.

The Trust is concerned about the potentially adverse impacts that the proposed site allocations will have in relation to areas of ancient woodland within and/or adjacent to site allocations. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development.

The Woodland Trust objects to the inclusion of the below site allocation in the Woking Borough Council Site Allocations DPD as it is likely to cause damage and/or loss to areas of ancient woodland and wood pasture within or adjacent to its boundary. For this reason we believe the site below is unsound and should not be taken forward. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

#### **Officer Response:**

The Council is aware of the existing designated Ancient Woodland towards the northern end of the land. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees. This is highlighted in the Housing White Paper. This particular Ancient Woodland is designated on the Council Proposals Map for protection. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

The nature and type of some of the surveys that will be required to accompany any development proposals will be undertaken at the development management stage. The land will only be released for development as part of the review of the Core Strategy and or the Site Allocations DPD, and that will be the most appropriate time to set out the key requirements for any development to be acceptable. The surveys will make sure that those trees and other features of environmental and amenity significance are fully assessed and protected from development, where necessary.

Environmental organisations such as yourself, Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into

account to inform decisions about the preferred approach to safeguarding and how the potential integrity of the land can be protected.

The Council will work constructively with the Woodlands Trust to identify the necessary buffer to support development of the land if it is allocated and/or developed. This will be dealt with at the Development Management stage.

**Contributor Reference:** 01987/1/001  
**Customer Name:** Mr Nick Cockburn

**Summary of representation:**

Objection to development on the fields in Pyrford at Upshot Lane as the impact of the additional housing planned will have a very detrimental effect on the area. The primary school is already over capacity and will not be able to handle the demand from additional families and the road infrastructure is not able to handle the additional housing either. Pyrford should remain a village and the green belt land that surrounds it is essential in maintaining the character of the environment.

There are other sites more suited to the development in the area including the disused airfield at Wisley which has good road links for the A3/M25 and the proposed location at Martyrs Lane which doesn't have such an impact on the countryside and has been deemed to have a higher suitability rating than Upshot Lane in the Brett Woking Green Belt report.

Brownfield sites should be considered as a priority over greenbelt as per the NPPF instruction.

**Officer Response:**

Objection to Pyrford site and support for Martyrs Lane noted.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of roads and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary

review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following

key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The representation regarding Green Belt, infrastructure, local character and brownfield sites have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Please note the airfield at Wisley is outside of Woking Borough and therefore cannot be considered or allocated for development by Woking Borough Council.

**Contributor Reference:** 01990/1/001  
**Customer Name:** Mr R S Newberry

### **Summary of representation:**

Strongly support the substitution of the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet the long term future development needs of the borough between 2027 and 2040.

The development of the land in the Upshot Lane area of Pyrford would not only remove a valued part of the Green Belt but would increase the traffic problems on the B367. People living in the Upshot Lane area would naturally use this road as a route through to the A3 and the M25. This road was never intended for heavy traffic and there is a particular problem with the narrow entry of Newark Lane into the village of Ripley.

### **Officer Response:**

Support noted and in terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of roads and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of

additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding Green Belt, infrastructure and local character have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 01994/2/001  
**Customer Name:** Mrs Marie Craig

**Summary of representation:**

Objects strongly to the proposed seizure of fields both sides of Upshot Lane and land at Martyrs Lane including New Zealand Golf Course for building, as three and four thousand new homes in the Pyrford/West Byfleet area have not been officially stipulated and that just over one thousand are needed. The Upshot Lane fields are productive land bordered by hedgerows supporting wildlife. Between them is a narrow road already burdened by heavy traffic which should be saved.

New Zealand Golf Course would yield a huge number of dwellings. The Martyrs Lane site is on the fringe of our established communities. It is somewhat derelict land serving little purpose. The Waste Tip would be maintained.

There is scope to widen Martyrs Lane itself to cope with the additional cars that the new residents would bring and additional essential amenities such as a first school, doctor's surgery, bus route could be included without adding to the pressure of the surrounding area.

All things considered, I think building on the Martyrs Lane site would be best.

**Officer Response:**

The Core Strategy states that between 2010 and 2027 the Council will facilitate the delivery of at least 4964 dwellings across the borough. As part of the Site Allocations DPD process, the Council is also seeking to safeguard land in the Green Belt for development needs between 2027 and 2040 of at least 1200 dwellings. The Council's Regulation 18 consultation Issues and Matters Topic Paper, in particular Section 1.0 and 2.0, sets this out in more detail.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford site is not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that this particular site is of low soil quality.

In terms of wildlife, the constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD. These policies would apply to any of the proposed safeguarding sites.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

In terms of Golf Course, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the

Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council is not intending to remove the recycling centre and the social and environmental implications of the recycling centre will be fully assessed as part of the development management process, and appropriately mitigated.

In terms of roads and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of public transport currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary

infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy.

**Contributor Reference:** 01998/1/001  
**Customer Name:** Mr Alan Somers

**Summary of representation:**

Objection to developments on Green Belt lands, particularly the fields adjoining Upshot Lane, Pyrford. If development is truly necessary, then it should be restricted to Brownfield sites, and not until all brownfield sites have been developed should there be consideration of any greenfield sites.

Martyr's Lane site is Green Belt land with extensive brownfield elements. If such a single site needs to be considered for development, it should be only after all other brownfield sites have been developed, incurring whatever clean-up costs the developers may have to face at their own expense.

The Martyr's Lane site should be used before any other Green Belt site could ever be considered. Only 1024 houses are required and that only the Martyr's Lane site north of Golf Club is needed.

Objection to any development of the Pyrford fields Green Belt lands.

**Officer Response:**

Support and objection to any development of the Pyrford fields Green Belt lands is noted.

The representation regarding Green Belt land and brownfield sites has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

**Contributor Reference:** 02000/1/001  
**Customer Name:** Mr Neill Morrison

**Summary of representation:**

Objection to development on Pyrford Fields and prefers for development to be centralised in the Borough on the Martyrs Lane site identified as an alternative.

As per advice provided by the Pyrford Neighbourhood Forum, the site is preferred because the Martyrs Lane site is on Green Belt land, some of which has been previously developed, which is not true of the other proposed sites. The A245 through West Byfleet & over M25 bridge has virtually no capacity left, especially when other new development in the area is taken into account. The "economies of scale" of developing a single site and would help to find solutions to many of the infrastructure concerns. Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough. The Heritage features of the area which incorporates the two Pyrford fields includes the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a Site of Nature Conservation Interest, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area. Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'. Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

**Officer Response:**

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to

expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

In terms of roads, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If

any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This Pyrford site is not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that this particular site is of low soil quality.

The representation regarding the development impacts in Pyrford such as those on amenity and landscape, have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02023/1/001  
**Customer Name:** Mrs Kathy White

**Summary of representation:**

Objects to building on Green Belt sites in Pyrford. The Broadoaks site a mile down the road has been granted permission to build 117 houses and a School and this will add to the already congested roads. This will also impact on the Health Centre in Madeira Road which is already overstretched.

**Officer Response:**

The representation regarding the impact of development in Pyrford including that on the Green Belt, infrastructure and medical facilities, has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and

- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02020/1/001  
**Customer Name:** Mrs Carole Baker

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, Traveller accommodation and the necessary social and community infrastructure needed to support it. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

Masterplanning of the site would allow for the provision of affordable housing which is needed in the Borough as the Council is currently not meeting its targets. The site would also be able to accommodate specialist residential accommodation for older people and vulnerable groups.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is within Flood Zone 1 and not in Flood Zone 1 and 3 and is flat and therefore make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

The site could provide Gypsy and Traveller accommodation for those wishing to live in the east of Woking. All sites are currently in the southwest of the borough. This would also meet the requirements of Policy CS14 and meet Woking's current and future Traveller accommodation needs. Ten Acre Farm, Smarts Heath Road and Mayford, (GB7) Traveller site proposal in the Schedule 18 consultation can therefore be removed as a Traveller site proposal. The site is suitable for Gypsy and Traveller pitches and would comply with Policy, no significant policy constraints in that the site and it is not within an international environmental designation and the site does not compromise the objectives of nationally recognised designations. Will be able to form a community and have shared interest complying with the Designing Gypsy and Traveller Sites – A Good Practice Guide (2008),

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

The representation relating to planning application reference PLAN/2011/0823 for McLaren Technology Centre has been noted. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of the planning history of the site as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would

only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding the representation that one site will simplify the development management process, the Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development irrespective of the location of the preferred sites or their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the

safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

Development at either the Martyrs Lane site or the multiple sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Whilst the representation considers the site to be located on stable and flat ground, an investigation of the ground conditions of the land will always be a pre-requisite of the development of a site, regardless of whether it is the land to the east of Martyrs Lane site or the six original sites. These pre-development studies will make sure that existing ground conditions are appropriately assessed and where necessary for development to be planned to take it into account.

The Council has robust policies in place to ensure that any land contamination is fully assessed and remediation measures are undertaken prior to development taking place. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett

considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

It is correct that the land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. It is acknowledged that there is an Ancient Woodland towards the northern part of the site and this will be protected as part of any development of the site if the land were to be safeguarded. The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the

Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

It is important that all development across the borough is fully integrated into the local community. This is set out in Core Strategy Policy CS1: A spatial vision for Woking Borough as well as the reasoned justification to support the policy. In design terms, the Council has a number of policies and guidance that new development will be required to meet that will help create sustainable communities.

It is accepted that the land east of Martyrs Lane is in close proximity to some major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

Regarding road infrastructure, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and

- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding representation 13 on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02001/1/001  
**Customer Name:** Kristine Gorton

**Summary of representation:**

Objects for a number of reasons including the loss of precious green belt land; increase of traffic volume on already congested roads; both impacting on air quality, noise & quality of life. Increased demand on services infrastructure, like doctors, trains, schools, parks & woodland areas, shops, library. Loss of village character of Woodham, West Byfleet and others. Undesirable urbanisation through increase in population density.

**Officer Response:**

In terms of infrastructure, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

In terms of local congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of

development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The social and environmental implications of the development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

In terms of the issues raised such as loss of Green Belt, character and increase in population, these issues have already been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', please refer to section 1.0, 7.0 and 23.0 for the Council's response.

**Contributor Reference:** 02006/1/001  
**Customer Name:** Mr Andrew Yeo

**Summary of representation:**

Support the substitution of Martyrs Lane for the following reasons; the site is large enough (112 hectares) to accommodate 1,200 houses, including affordable housing, one or more Gypsy and Traveller sites, and the necessary infrastructure of shops, primary schools & health centre. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones. It is much easier to create the associated infrastructure rather than overloading existing over-stretched facilities. It will also simplify the process for obtaining planning permission.

The A320 provides easy access to the M25 and Heathrow Airport to the North, and to Woking Town Centre and the mainline railway station to the South. Bus routes and cycle routes, including to Woking Town Centre, exist already. There is little development along the A320 North of Woking, making road widening easy to achieve. This is a better proposal than the option of building South of Woking where the A320 is often congested. The new Hoe Valley School and associated Leisure Facilities Centre will further adversely increase traffic congestion.

Martyrs Lane would be suitable to accommodate one or more Gypsy and Traveller sites allowing for the removal of the Ten Acre Farm Traveller site (GB7). Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking. Currently, almost all other pitches are at the South West side of Woking in Heathlands Ward (Mayford), restricting Gypsy and Traveller choice as to where they can live. The Gypsy and Traveller sites would be sustainable as they would be within the residential development site. Martyrs Lane Travellers sites would satisfy the Council's Core Strategy (2012), CS14, Gypsy and Traveller pitch criteria, as follows:

- o It would have safe vehicular access from the highway and have adequate space for parking provision and turning areas.
- o It would have adequate amenity for its intended occupiers, including space for related business activities, and Green space for children.
- o It would be designed so as not have unacceptable adverse impacts on the visual amenity and character of the area.
- o It would have adequate infrastructure and on-site utilities to service the number of pitches proposed.
- o It would have safe and reasonable access to schools and other local facilities.
- o It would promote integrated co-existence between the pitches and local community.

Any development of Gypsy and Traveller pitches would link in with other broader strategies in place which together deliver housing, pitches, and other uses, services and Green infrastructure in the most appropriate way. Pitches could be designed with the recommended privacy, security and space provisions, whilst the overall residential development could provide open-space and playground facilities.

Gypsy and Traveller pitches within the residential development would also enable residents to:

- o Seek or retain employment
- o Attend school, further education or training
- o Obtain access to health services and shopping facilities.

The Martyrs Lane site is in the Green Belt, but it has no other National or Local landscape issues such as those in Mayford. There are no Escarpment and Rising Ground Landscape Importance issues such as those faced in GB10, GB11 and GB13.

Most of the site is clear of Flood 2 and Flood 3 designations which should make the planning and development process simpler and more cost effective. Much of the land is largely disused and derelict. Planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Housing at Martyrs Lane would provide accommodation for employees of major companies operating close by, St Peter's Hospital, the Animal and Plant Health Agency, McLaren Technology Centre and the Brooklands Retail Park. A new Martyrs Lane Neighbourhood would provide additional employment opportunities for residents.

The Martyrs Lane site is almost twice the size as the six sites it would replace. It should therefore be possible to build all the properties necessary to fulfil Woking's future Housing and Traveller needs up to 2040 but also provide a handsome margin for any additional housing needs that may arise well beyond the planned 2040 period.

#### **Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport

and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government Policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is single or multiple sites.

At the Regulation 18 stage Officers had recommended to Council the needs for travellers accommodation should be met at 5 Acres and 10 Acres. The need as determined is 19 pitches up to 2027. At the Council meeting members have requested that Officers re-visit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 Consultation. Officers accordingly are investigating this matter and will report to Council in due course.

In terms of flooding, given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft

Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

In terms of local congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various

development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of public transport infrastructure currently serving the vicinity of the Martyrs Lane area is relatively limited. However, this would equally be true for most of the other six safeguarded sites. Access to rail stations by public transport from the various sites has already been dealt with above. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. It would therefore be necessary for the Council to work with providers to improve service provision and frequency, in particular the 592 if this site were to be safeguarded for future development. As emphasised above, bus services serving the other six safeguarded sites are also relatively limited and their development would equally require measures to improve services in these areas.

A key thrust of the transport policies of the Core Strategy and the NPPF are to influence a shift from car based travel to sustainable travel modes such as public transport, walking and cycling.

The overall spatial strategy of the Core Strategy is to concentrate most new development at the main centres because they offer a range of key services and facilities to help minimise the need to travel and to encourage sustainable travel modes. Specific references are made to Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. These policies have been scrutinised at Examination and judged to be in conformity with the NPPF. In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality. Policy CS18 of the Core Strategy makes this point very clear.

**Contributor Reference:** 02007/1/001  
**Customer Name:** Ms Suzanne Heaney

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford) to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 02011/1/001  
**Customer Name:** Mr Stewart Collins

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

The representation considers, the points raised on the "NoWoodhamNewTown" website and conclude that the single Martyrs Lane site is far preferable to the scattered alternatives previously included in the draft DPD. This is not only for economies of scale but also because there are far better opportunities for improving access and connections to Martyrs Lane than for the already over-congested alternatives.

Objections raised on the "NoWoodhamNewTown" website are primarily against any additional housing development in the area, and most points apply equally to alternative sites. Some points are factually incorrect, such as claiming that 3500 homes are planned and that the New Zealand golf course is to be included.

Adding more than 1000 homes anywhere within the borough will exacerbate existing congestion problems. Only the Martyrs Lane site may minimise the adverse impact as it is on the outskirts of the main population. Much of the traffic may be directed away from the centre. Infrastructure improvements and increased capacity can be realised at Martyrs Lane that would not be practicable elsewhere within more central areas. These include health care and school provisions, plus high speed broadband connections which may encourage working from home and thus reduced commuter traffic.

**Officer Response:**

The representation is correct to state that 3500 homes are not planned for the site. However, the Golf Course is included within the development boundary. The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting

their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;

- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure including education, broadband and healthcare provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

**Contributor Reference:** 02013/1/001  
**Customer Name:** Mr Alan John Small

**Summary of representation:**

Objections to the proposed development of the fields either side of Upshot Lane, Pyrford because, the two fields either side of Upshot Lane are part of the landscape of Pyrford and must be preserved if the unspoilt semi-rural character of Pyrford is to be maintained. These fields have been farmed for centuries and have never been built on. They are still used to produce crops for either animal feed or bio fuels. The Martyrs Lane site has no current use at all.

The land around the medieval St. Nicholas Church and the escarpment along Warren Lane and Church Hill are believed to represent one of Surreys last remaining examples of natural beauty in a farming setting. The historic wooded grounds of Pyrford Court are Grade 2 listed, and a Conservation Area covers Pyrford Village. Pyrford Common is designated as a site of Nature Conservation Interest. Aviary Road Conservation Area, the network of ancient footpaths and the two fields either side are integral to the setting of the area.

The Martyrs Lane Site would provide economies of scale, making it easier to resolve infrastructure issues like water, waste and electricity. There would be less disruption to residents and traffic than would be incurred at the Upshot Lane Site. Land values at the Martyrs Lane Site are less than at Pyrford, and would therefore facilitate the provision of Affordable Housing.

There are three major employers close to the Martyrs Lane Site namely McLaren, Animal and Plant Agency and St. Peter's Hospital, whose employers would benefit from new housing in the vicinity.

The Martyrs Lane Site has the benefit of main road links. Chertsey Road to Woking and in the other direction to Chertsey and the M25, giving easy access to both Heathrow and Gatwick Airports. There is access to Shearwater and West Byfleet via Woodham Lane, and the existing roundabout at the northern end of Martyrs Lane gives access to the A320.

Pyrford Junior School is already fully subscribed. The Martyrs Lane Site would provide an ideal opportunity to build a new school and health centre as part of the Martyrs Lane development Plan.

**Officer Response:**

Support of Martyrs Lane site and objection to building on Pyrford Green Belt are noted.

In terms of heritage and assets, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the

sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This site in Pyrford is not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that this particular site is of low soil quality.

In terms of character of Pyrford this has already been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', please refer to section 7.0 and 23.0 for the Council's response.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

In terms of local congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 02014/1/001  
**Customer Name:** Mr John B Chester

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

It makes much more sense to use this land as it will not have some much environmental and social impact as it would if you decided on the Pyrford sites. Green Belt should be saved and not developed upon. The Martyr's Lane site already has some development on it and should be used instead. Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance', and Pyrford Green Belt is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.

**Officer Response:**

Support of Martyrs Lane site and objection to building on Pyrford Green Belt are noted. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the Pyrford escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

The social and environmental implications of the development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

In terms of the issues raised about the Pyrford site such as Green Belt, character and public amenity these issues have already been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', please refer to section 1.0, 7.0 and 21.0 for the Council's response.

**Contributor Reference:** 02021/1/001  
**Customer Name:** Mr Michael Adams

**Summary of representation:**

This site is unsuitable for the following reasons; it has not been part of the proper consultation as required. It should not be treated as an individual consultation the whole DPD should be re-issued for consultation. Responses to the original consultation were made on the whole plan they are now void. The site is within the green belt and is unlikely to become available. There is no evidence that the site will become available.

There is no infrastructure to support this site and is partly in the floodplain. WBC officers reports suggest this site is unsuitable and it is not ideal to only agree one site in case this does not materialise and more smaller sites are more easily integrated.

**Officer Response:**

The consultation concerns the approach the Council should take with regards to safeguarded sites to meet future development needs between 2027 and 2040. It was appropriate and proper for the Council to carry out the consultation exercise. National planning policy requires an assessment of all reasonable alternatives before preferred options are identified. The availability of land is a significant consideration but not the only consideration. The overriding consideration in this regard is to identify the most sustainable land when compared against all other reasonable alternatives. The information that is gathered from the representations is useful evidence to inform the Council's decision on the matter.

The regulation 18 Consultation responses have been taken into account and can be viewed on the Council website. All the points from Regulation 18 Consultation are still valid and will be used to inform the Regulation 19 version of the Site Allocation DPD.

Availability of land is a significant material consideration for the Council to take into account in deciding its preferred approach to safeguarding for the purposes of the Regulation 19 consultation. The land east of Martyrs Lane is in multiple ownership, and the New Zealand Golf Course and McLaren collectively owns a significant proportion of the land.

Paragraph 182 of the NPPF deals with examination of local plans. It requires the Council to only submit a plan for examination which it considers sound. Amongst other things, to be sound, the plan:

- o Should be deliverable over its period;
- o Should be the most appropriate strategy when compared against the reasonable alternatives, based on proportionate evidence.

Footnote 11 of the NPPF provides clarity on what a deliverable site is. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be available with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Whilst five years is emphasised in the

footnote, its relevance should be seen in the context of the details of the representations received from the owners of the land.

The New Zealand Golf Course has written to the Council and has made formal representation as part of the consultation to confirm that the part of the land that is in its ownership will not be made available now, in the future and never to meet future development needs. In this regard, there is no expectation for a change in their position within and beyond five years. The representations from the New Zealand Golf Course are addressed in full separately.

McLaren Technologies Group Limited has also made representations. Whilst it would generally support in principle the release of the land from the Green Belt, it would only allow its land holding to be used as a strategic employment site to support its own future expansion programme. McLaren will not allow its land to be used as envisaged in the consultation. If the Council were to decide not to release the land east of Martyrs Lane from the Green Belt, McLaren have provided reasons why its land should be designated as a Major Developed Site in the Green Belt. The representations from McLaren has been addressed in full separately.

The lack of availability of the above sites could cast doubt on the deliverability of the land if it is safeguarded. To put it into context, assuming the two sites will not be available to meet future development needs and the Surrey County Council's Waste Safeguarded Site is also not available, the residual land will only deliver about 300 dwellings (at 30 dph) as against the 1,200 dwellings that the Council wish to safeguard land. If the Waste Safeguarded Site is made available, there will be sufficient land to enable the delivery of about 600 dwellings at the same density. This is still significantly short of what is needed. Importantly, the Council has to make sure that any land that it safeguards would not lead to an isolated development within the Green Belt.

It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the land is the most sustainable when compared with the original six safeguarded sites.

In terms of infrastructure, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of flooding, Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. The land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. By releasing Green Belt land for future development, the Council also has to make sure that there is a strong defensible Green Belt boundary. The areas of the land covered by Flood Zones 2 and 3 are included within the safeguarded designation to make sure that there is a strong defensible Green Belt boundary. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this. Based on the above, it is not envisaged that the occupants of the development on the site would face unacceptable risk of flooding.

In terms of the Council's reports, the Council has carried out two relevant Green Belt studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 01985/1/001  
**Customer Name:** Patricia And Michael Baker

**Summary of representation:**

Support substituting land to the east of Martyrs Lane in order to meet the long-term future developments of the borough.

**Officer Response:**

Support noted

**Contributor Reference:** 01986/1/001  
**Customer Name:** Ms Charlotte Stacey

**Summary of representation:**

Objection to the proposed development on either side of Upshot Lane, Pyrford. Loss of beautiful Green Belt land and lack of infrastructure to support the proposed dwellings. It is difficult to get appointments at the health centre in West Byfleet. The local school is oversubscribed and the roads are over crowded.

**Officer Response:**

Objection to development in Pyrford is noted. The matters raised in the representation regarding reasons against development in Pyrford have been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper'.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 02009/1/001  
**Customer Name:** Ms Deirdre Cooke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02010/1/001  
**Customer Name:** Ms Anna Whindle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02012/1/001

**Customer Name:** Meirion Shaw

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02015/1/001  
**Customer Name:** Mr Martin Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02017/1/001  
**Customer Name:** Mrs Sally Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02018/1/001  
**Customer Name:** Ms Margaret Hornsby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01984/1/001

**Customer Name:** Chloe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01988/1/001

**Customer Name:** Lesley Cook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01989/1/001  
**Customer Name:** Mr David Anderson-Bassey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01991/1/001  
**Customer Name:** Manuel Conde

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01992/1/001  
**Customer Name:** Mr John Stedman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01993/1/001

**Customer Name:** D G Fordham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01995/1/001  
**Customer Name:** Miriam Collins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01996/1/001  
**Customer Name:** Justyna Wasilewska

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01997/1/001

**Customer Name:** Anna

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01999/1/001  
**Customer Name:** Ms Patricia Kemp

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02002/1/001  
**Customer Name:** Ms Claire Gant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02003/1/001  
**Customer Name:** Ms Kim Peters

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02004/1/001  
**Customer Name:** Mr Tony Peters

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02005/1/001  
**Customer Name:** Ms Shelia Day

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02008/1/001  
**Customer Name:** Mr Robert Cooke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02019/1/001  
**Customer Name:** Ms Maria Santos

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02022/1/001  
**Customer Name:** Priscilla Chandro

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02024/1/001  
**Customer Name:** Ms Tracy Bagnall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02025/1/001  
**Customer Name:** Mr Kenneth Willingham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02026/1/001  
**Customer Name:** Ms Rosario Perri

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02027/1/001  
**Customer Name:** Ms Jennifer Perri

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02028/1/001

**Customer Name:** Antonio Perri

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02029/1/001  
**Customer Name:** Vincenza Perri

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02030/1/001  
**Customer Name:** Ms Maria Perri

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02031/1/001  
**Customer Name:** Mario Vistocco

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02645/1/001  
**Customer Name:** Mr Richard Lea

**Summary of representation:**

Supports the proposal. This large site would be more economical to develop than several small sites separated by some distance.

Understands that brownfield land has been assessed, and that housing targets will probably only be achieved using Green Belt land. However, use of Green Belt land should be judiciously considered, especially where it results in urban areas merging to a point where the identity of settlements is lost, such as that in Westfield and Old Woking, Knaphill and Horsell. The Core Strategy only identifies the villages of Mayford and Brookwood as remaining.

Martyrs Lane site would not merge villages as it would only border Sheerwater and to a lesser extent Woodham. These villages are already joined. If GB10 and GB11 were to be developed, it would merge Mayford with Hook Heath; GB4 would infill Byfleet; GB5 expand Byfleet; GB12 an infilling of Pyrford and GB13 an expansion of Pyrford.

Benefits of Martyrs Lane site are:

Good access to A320 and A245 with links to M25. Existing sites access onto country lanes, in-town roads or onto B roads.

Opportunity for new infrastructure to be delivered to support development, reducing overall costs, rather than overstretching existing infrastructure.

Greater opportunity and flexibility for affordable homes and Traveller accommodation.

Unlikely to have adverse impacts on surrounding water table. Development on the Hook Heath escarpment would affect the area below and on the flood zone in and around the Hoe stream and surrounding heathland and SSSI.

Fewer existing residents will be affected.

**Officer Response:**

Support for the proposal is noted.

The Council has judiciously considered the use of Green Belt land, as suggested in the representation. The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt. In contrast, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references regarding merging and urban sprawl, made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced, and the Council is confident that the overall integrity and purposes of the Green Belt would be sustained.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

The Regulation 18 consultation Issues and Matters Topic Paper further addresses the concerns in the representation, including Section 12 on merging settlements; Section 15 on urban sprawl; and Section 23 on preserving general character of areas.

The benefits of the proposal at Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

Although the site benefits from good accessibility, a development of this scale would lead to traffic impacts. The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the

Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that through careful design any of the proposed safeguarded sites could include pitches to meet the accommodation needs of Gypsy and Travellers.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

Section 5 of the Regulation 18 consultation Issues and Matters Topic Paper provides a detailed explanation regarding the suitability of sites according to their susceptibility to flood risk, and how flood risk elsewhere is not exacerbated. Given the location and size of all the land under consideration, a detailed flood risk assessment will be a requirement of any development proposal on sites that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development on any of the sites under consideration.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the

impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 01981/1/001  
**Customer Name:** Mr Albert Kirby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01983/1/001  
**Customer Name:** Ms Fiona Duncan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02670/1/001  
**Customer Name:** Ms Vivienne Roberts

**Summary of representation:**

Objects to the originally proposed sites – particularly Pyrford sites.

Objects due to traffic, which is already a nightmare and very dangerous. Even over the last 10 years there is now a constant flow of traffic which disregards speed limits and people drive too fast.

There are no facilities to cater for more development in Pyrford.

**Officer Response:**

The details raised in the representation are addressed in detail in the Regulation 18 consultation Issues and Matters Topic Paper, particularly Section 3 on infrastructure, and Section 20 on the Transport Assessment. Section U also sets out a detailed response to concerns about congestion on existing roads and the danger it poses.

**Contributor Reference:** 02668/1/001  
**Customer Name:** Mrs Jennifer Grayson

**Summary of representation:**

Supports proposal excluding golf course, in favour of developing on Pyrford fields.

**Officer Response:**

Support is noted.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 01957/1/001  
**Customer Name:** Surrey Heath Borough Council

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 01962/2/001

**Customer Name:** Mr Ray Jones

**Summary of representation:**

The representation is dismayed at the proposed developments of the Pyrford Fields and strongly feels, it must be protected.

The alternative proposal to develop part of land adjoining Martyrs Lane, if needed at all ,is a more reasonable compromise provided necessary infrastructure is also planned.

A single site at Martyrs Lane would provide a better economy of scale on the infrastructure requirements and provision of Health facilities, necessary school, road access and affordable housing.

**Officer Response:**

Objection to Green Belt development in Pyrford is noted.

The Council is fully committed to the comprehensive delivery of the Core Strategy. In the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs, has already been established and is consistent with national planning policy.

The merits of the Martyrs Lane site as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane or the six other sites. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 01923/2/001

**Customer Name:** Mr David Bell

### **Summary of representation:**

Supports the development at Martyrs Lane as the alternative to the other six sites of the consultation will adversely increase the traffic flows through West Byfleet, Old Woking Road, Parvis Road, and Byfleet Road, which are already heavily congested.

The development at Martyrs Lane provides much shorter and ready access to the J11 of the M25, if some improvement is carried out to the short section of Guildford Road.

In addition, it would be possible to provide a green garden access by foot and cycle path into Woking centre (similar to the access for non-road traffic around Milton Keynes) as Woking provides the better rail links to London, compared to West Byfleet and Byfleet and New Haw stations which are slow connection and constricted by parking issues.

### **Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

A key thrust of the transport policies of the Core Strategy and the NPPF are to influence a shift from car based travel to sustainable travel modes such as public transport, walking and cycling. Specific references are made to Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. If this site or any of the six sites are safeguarded the Council will look into adding foot and cycle paths.

**Contributor Reference:** 01917/1/001  
**Customer Name:** Ms Joanna Russell

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 01927/1/001  
**Customer Name:** Mr Alan Fleming

**Summary of representation:**

Insufficient plans provided to address the required infrastructure to support development.

**Officer Response:**

The representation regarding infrastructure provision has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 01976/1/001  
**Customer Name:** Mr Graham Baker

**Summary of representation:**

Agree to the possibility of substituting the land east of Martyrs Lane.

The site is big enough (112 hectares) to accommodate 1,200 houses, including affordable housing, one or more Gypsy and Traveller sites, and the necessary infrastructure of shops, primary schools, health centre etc. There are advantages of one larger site than several dispersed smaller ones. It is easier to create the necessary infrastructure rather than overload the existing over stretched facilities. It will also simplify the process for obtaining planning permission.

Masterplanning will allow for the provision of affordable housing. The current targets are not being met. The site could also provide specialist residential accommodation.

The site could be used to provide pitches for Gypsy and Traveller accommodation in the east of Woking. Currently all other pitches are in the south west of the borough. The site has no significant policy constraints, it is not within an international environmental designation and the site does not compromise the objectives of nationally recognised designations.

The other physical constraints. Flooding is not high risk and can be mitigated, it is stable land, the site is not located on contaminated land which cannot be mitigated, it has good road access and in reasonable proximity to local services and facilities. In addition, development and use of the site will not have an adverse impact upon the Green Belt, landscape nor biodiversity which cannot be mitigated, the site is not subject to unacceptable noise levels nor is it likely to give rise to unacceptable noise levels and the site will have a good residential environment and will not adversely impact upon neighbouring residential amenity.

Gypsy and Traveller pitches would be suitable by virtue to being within the residential development site which itself would be sustainable. There is mean of access, transport modes and reasonable distances from services, promotion of integrated pitches and the local community, easy access to healthcare provision, close to bus routes, shops and schools, suitable ground conditions and levels and on a site that has low risk of flooding.

The site would satisfy the policy requirements of Core Strategy Policy CS14 and could be designed in accordance with Designing Gypsy and Traveller Sites – A Good Practice Guide (2008).

The site could provide open space and playground facilities and would enable residents to seek or retain employment, attend education and obtain access to health and shopping facilities.

Integration of traveller pitches would encourage a greater sense of community with shared interests.

The site would meet Woking Traveller accommodation need up until 2040, thereby removing Ten Acre Farm as a Traveller site in the Site Allocations DPD.

There are major employers close by and a new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is in Flood Zone 1 with flat and stable ground. It would make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

#### **Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

The representation relating to planning application reference PLAN/2011/0823 for McLaren Technology Centre has been noted. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of the planning history of the site as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding the representation that one site will simplify the development management process, the Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development irrespective of the location of the preferred sites or their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' are accordingly investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a

sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

Development at either the Martyrs Lane site or the multiple sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Whilst the representation considers the site to be located on stable and flat ground, an investigation of the ground conditions of the land will always be a pre-requisite of the development of a site, regardless of whether it is the land to the east of Martyrs Lane site or the six original sites. These pre-development studies will make sure that existing ground conditions are appropriately assessed and where necessary for development to be planned to take it into account.

The Council has robust policies in place to ensure that any land contamination is fully assessed and remediation measures are undertaken prior to development taking place. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

The Council has undertaken a number of landscape and Green Belt studies to inform the Site Allocations DPD process. The Council's latest evidence carried out by Hankinson Duckett considered the Martyrs Lane site specifically and came to the conclusion that the site is of critical importance in its contribution towards the purposes of the Green Belt, with its important contributions to the purpose of preventing urban sprawl and the safeguarding of the countryside. The report also noted that the site is of critical importance to the landscape character of the wider area. In addition, the Council's Green Belt boundary review assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The reports can be found on the Council's website.

It is correct that the land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. It is acknowledged that there is an Ancient Woodland towards the northern part of the site and this will be protected as part of any development of the site if the land were to be safeguarded. The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and

Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The social and environmental implications of the site will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage. It should be noted that these policies would apply to any of the allocated sites in the Site Allocations DPD.

It is important that all development across the borough is fully integrated into the local community. This is set out in Core Strategy Policy CS1: A spatial vision for Woking Borough as well as the reasoned justification to support the policy. In design terms, the Council has a number of policies and guidance that new development will be required to meet that will help create sustainable communities.

It is accepted that the land east of Martyrs Lane is in close proximity to some major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

Regarding road infrastructure, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);

- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding representation 13 on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01980/1/001  
**Customer Name:** Mrs Elizabeth Wild

**Summary of representation:**

Objects to development for the following reasons

Pyrford Green Belt has been farmed for centuries unlike the Martyrs Lane site.

Pyrford Green Belt is an important part of Green Belt. Should not erode Green Belt and should reuse previously developed land.

Not persuaded that the area needs 1024 dwellings.

There is no need to develop the New Zealand Golf Course. Such a large development would be detrimental to traffic.

One large development at Martyrs Lane would be more efficient and environmentally manageable than several sites.

Public services such as health and education provision are likely to be overburdened.

**Officer Response:**

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

The Council is of the opinion that it has made the case for releasing Green Belt land, including safeguarding land to meet future development needs, and this has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. As part of the Site Allocations DPD process the Council considered about 125 sites in total. The full list of these sites and their individual assessments have been set out in the Sustainability Appraisal. Section 11.0 of the Regulation 18 consultation Issues and Matters Topic Paper sets this process out in more detail.

Regarding the representation relating to the need to safeguard land for 1024 dwellings, this has been addressed in Section 2.0 of the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the Martyrs Lane site is of a significant size, it should be noted that McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other

constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The environmental implications of the allocating any of the proposed sites will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of

communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

**Contributor Reference:** 01982/2/001  
**Customer Name:** Mr Andrew Barnes

**Summary of representation:**

The whole of the borough is subject to extreme traffic congestion, especially the Six Crossroads roundabout and the A245 towards West Byfleet. To concentrate all future development on one site as opposed to spreading it over the six other sites would contradict the need to minimise congestion further.

Development would be contrary to the 1999 Local Plan for the area, which include the protection of Horsell Common SSSI, the importance of the Green Belt and the amenity value of the New Zealand Golf Course. This matters are still relevant today. Horsell Common is already overused to the detriment of its ecology and further development will make the situation worse.

Woking Borough Council evidence base documents recommend against development in this part of the Green Belt.

The air pollution associated with the A320 and A245 would be exacerbated to the detriment of the local environment and wildlife habitats.

Local infrastructure will not be able to sustain a development of this size. Existing facilities are inaccessible other than by private transport. The local schools are not within the borough boundary.

The existing bus service is inadequate.

**Officer Response:**

The Council is aware of local concerns regarding traffic and road congestion. As addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, the Council has undertaken a number of transport studies to assess the impact of the safeguarded sites on the road network. Please refer to the topic paper for further detail.

It should also be noted that the Council has robust transport policies in place to influence a shift from car based travel to sustainable travel methods such as public transport, walking and cycling. This includes Core Strategy Policy CS18: Transport and accessibility which clearly demonstrates the importance that the Council places on encouraging walking and cycling. As part of the Site Allocations DPD process, the Council undertook a Sustainability Appraisal (SA) to identify the most sustainable sites for development. This assessment considered about 125 sites in total and each sites' accessibility to existing services and facilities were part of the overall assessment. The SA can be found on the Council's website.

It should be noted that the Local Plan (1999) has now been superseded by the Core Strategy (2012) and the Development Management Policies DPD (2016). Nevertheless, the Council has a number of policies that address the issues noted in the representation. In particular, Policy CS7: Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the Thames Basin Heaths SPA and SAC is avoided as a result of development. As part of the consultation process, the Council has consulted with Natural England, Horsell Common Preservation Society and Surrey Wildlife Trust. Their representations will be taken into account and addressed separately. The representation regarding wildlife has also been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Core Strategy Policy CS6: Green Belt and Development Management Policy DM13 also provide robust policies to ensure that the Green Belt continues to serve its fundamental aim and purpose, and maintains its essential characteristics. These policies also ensure that it will be protected from harmful development. The Council has previously addressed the need to release Green Belt land for future development needs in the Regulation 18 consultation Issues and Matters Topic Paper, in particular Sections 1.0 and 2.0.

Core Strategy Policy CS17: Open space, green infrastructure, sport and recreation notes that these areas are highly valued by local people and provide opportunities for people to participate and enjoy sports and recreation and to facilitate effective access to the countryside and the amenity that it offers. As part of the consultation process, the Council has consulted with Sport England and their representation will be taken into account and addressed separately.

The representation regarding the Hankinson Duckett Associates Report has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The environmental implications of the proposal, including air pollution, will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

The representation regarding the impact of the proposal on infrastructure, including cross boundary implications, and the existing bus service have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 01925/1/001  
**Customer Name:** Mr Allen Taylor

**Summary of representation:**

Supports the proposal for safeguarding land at Martyrs Lane for future development needs.

Martyrs Lane is more suited to massive redevelopment. Pyrford sites are not suited due to severe traffic delays already experienced in the area.

Oppose any development in Pyrford.

**Officer Response:**

Support for the Martyrs Lane site and objection to development in Pyrford is noted.

The Council has addressed the transport implications of development in other parts of the borough, such as Pyrford, in the Regulation 18 Consultation Issues and Matters Topic Paper.

Whilst the representation is unclear as to why Martyrs Lane is more suited to massive redevelopment, it should be noted that McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Regarding traffic implications of safeguarding land at Martyrs Lane for future development needs, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 01926/1/001  
**Customer Name:** Mr Steve Henshall

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for future development needs but considers the number of homes to be too large for the local infrastructure. The location of the site is much better than the previous six sites.

The scale of development should be less.

**Officer Response:**

Support for the Martyrs Lane site is noted.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding the representation on the amount of development, the purpose of the Martyrs Lane consultation was to inform the Council's decision on its preferred safeguarding strategy. The overall capacity of the six original sites is broadly similar to the anticipated capacity of Martyrs Lane. If the Council were to safeguard Martyrs Lane for less than 1200 dwellings, then the Council could be required to identify more Green Belt land to meet the identified housing need.

**Contributor Reference:** 01932/1/001  
**Customer Name:** Saad Abdul-Rassak

**Summary of representation:**

Pyrford does not have the infrastructure to support such expansion

**Officer Response:**

The Council notes the representation outlining reasons against safeguarding land for future development needs in other areas of the Borough. This will be taken into account to inform the preferred approach to safeguarding.

Further details can be found in Officers' Response to the Regulation 18 Site Allocations DPD consultation.

**Contributor Reference:** 01933/1/001

**Customer Name:** Milo Gaster

**Summary of representation:**

I object to the plans to safeguard the green belt land areas in Byfleet, West Byfleet and Pyrford for future housing developments.

Green Belt land should be free from any kind of development what so ever.

**Officer Response:**

The Council notes the representation outlining reasons against safeguarding land for future development needs in other areas of the Borough. This will be taken into account to inform the preferred approach to safeguarding.

Further details can be found in Officers' Response to the Regulation 18 Site Allocations DPD consultation.

**Contributor Reference:** 01936/1/001  
**Customer Name:** Mr Eric Butterworth

**Summary of representation:**

Agrees to the to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocation DPD (in Byfleet, Mayford and Pyrford), to meet the long term future development needs of the Borough between 2027 and 2040.

However, does not wish the New Zealand Golf Course to be considered for development as believes that there is sufficient land within the designated area to meet the housing need without developing any of the golf course land.

Whilst the Martyrs Lane site is within the Green Belt a precedent was set by permitting the development of the McLaren's factory within the Green Belt adjacent to the proposed site. Furthermore, the existing infrastructure for this site is far better than the alternative sites which are already at maximum capacity.

**Officer Response:**

Support for the Martyrs Lane site is noted.

McLaren have made representations to confirm that their land holdings within the site area will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

It is acknowledged that part of the site as well as the adjacent McLaren site were granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 01938/1/001

**Customer Name:** Mr And Mrs Richard And Tara Bowling

**Summary of representation:**

Objects to development of Pyrford fields and supports Martyrs Lane for future development needs.

There is a lack of infrastructure in Pyrford, notably the size of Upshot Lane and Coldharbour Road which is at capacity already. There is no space in Pyrford to develop the necessary infrastructure.

**Officer Response:**

Objection to development in Pyrford and support for Martyrs Lane is noted.

The Council has addressed the representation on infrastructure and in particular the road network and congestion in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 01944/1/001  
**Customer Name:** Mr And Mrs David And Judith Meredith

**Summary of representation:**

Objects to development in Pyrford as it is already over built and over concentrated with cars and traffic.

The Martyrs Lane proposal offers the opportunity of a more self supporting community which would have less impact on the wider community.

**Officer Response:**

Support for the Martyrs Lane site and objection to development in Pyrford is noted.

The Council has addressed the representation regarding development in other areas of the borough, including Pyrford, in the Regulation 18 consultation Issues and Matters Topic Paper. In particular the matters relating to the impact of development on local character and traffic and congestion.

The merits of the Martyrs Lane site as set out in the representation are noted and will weigh in the balance of considerations by Members. Nevertheless to ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

**Contributor Reference:** 01947/1/001  
**Customer Name:** Rudi Smeaton

**Summary of representation:**

Martyrs Lane can provide a viable direction for housing growth as it has the capacity rather than overloading the areas encompassed by the six original sites.

**Officer Response:**

Support for the Martyrs Lane site is noted.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding site capacity, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding

policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 01948/1/001  
**Customer Name:** Ms Natalie Smeaton

**Summary of representation:**

Martyrs Lane can provide a viable direction for housing growth as it has the capacity rather than overloading the areas encompassed by the six original sites.

**Officer Response:**

Support for the Martyrs Lane site is noted.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding site capacity, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding

policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 01954/1/001  
**Customer Name:** Mr Colin Watson

### **Summary of representation:**

Supports the views of the Pyrford Neighbourhood Forum. Their analysis of the consultation is balanced and reasonable as it reflects the overall impact of the 2 options, the benefits and disbenefits and the risks and potential opportunities and losses of the Martyrs Lane site compared to the six original safeguarded sites.

In addition, concerned at the overall impact of development on Pyrford Village. The greatest is the impact of additional traffic as the existing road network is at capacity, dangerous and environmentally harmful. It also leads to congestion at West Byfleet traffic lights.

If new homes are needed they should be put where the traffic infrastructure can meet the extra demand – that is not the case in Pyrford.

Pyrford Green Belt should remain undeveloped.

The NPPF states that brownfield land should be used before Green Belt. If exceptional circumstances exist then this should apply to the Martyrs Lane site.

The Green Belt in Pyrford has been farmed for centuries and undeveloped. It is an important landscape feature in the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The Martyrs Lane site by contrast has no current use at all.

Planning permission has been granted for a factory in the northern section of the site, which has been revoked on request of the applicant. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. The land also includes a former army camp and landfill site. The site to the north is semi-derelict, unused, uncared for and overgrown woodland. It is pre-developed land in the Green Belt. The sites should have been initially prioritised by WBC.

There has been confusion regarding the number of dwellings required to be safeguarded. The Pyrford Neighbourhood Forum maintains that 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

**Officer Response:**

Support for the Martyrs Lane site is noted.

As addressed in the Council's Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has been established and is consistent with national policy. Therefore the focus of the land to the east of Martyrs Lane consultation should be about ensuring that the proposed allocations put forward by the Council in the Regulation 19 version of the Site Allocations DPD are the most sustainable when compared against other reasonable alternatives.

The representations relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- Woodham Court (SHLAAHEW006);
- Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 - 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 - 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes

shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach,

the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council has also previously addressed traffic and congestion issues relating to development in other parts of the borough, including Pyrford, in the Regulation 18 consultation Issues and Matters Topic Paper. This is available on the Council's website.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services

servicing some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding point 10 of the representation the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Whilst the merits of the Martyrs Lane site have been noted, it would be incorrect to state that the site is not used for recreational activities as it contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. As part of the consultation, the Council has consulted with Sport England and their comments will be addressed separately and will be used to inform the Council's decision on its preferred safeguarding strategy.

**Contributor Reference:** 01955/1/001  
**Customer Name:** Mrs Alexandra Clare Elbourn

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

The site contains some previously developed land which is not true of the other sites.

The A245 through West Byfleet and over the M25 is at capacity especially when other new development is taken into account. This will deteriorate further with housing in Pyrford and Byfleet.

Safeguarding one site would mean economies of scale and would help to find solutions to the infrastructure concerns.

The Pyrford Green Belt has amenity value as it is used for recreational uses.

The Green Belt in Pyrford is an integral part of the heritage setting of the area. The sites are surrounded by heritage assets and features.

The Pyrford landscape is protected by Woking Core Strategy policy CS24 as an 'escarpment and rising ground of landscape importance'.

The Green Belt in Pyrford has been farmed and is good quality agricultural land. They are an important contribution to the rural character of the area and setting for the southern gateway into the town.

People live in Pyrford because of its semi-rural character. Development would reduce the quality of life for residents with increased road congestion and further strain on already stretched infrastructure.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

Regarding the representation on heritage value, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close

to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

In addition, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

The representations relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

**Contributor Reference:** 01958/1/001  
**Customer Name:** Mr Peter Jagger

**Summary of representation:**

The Martyrs Lane site is larger and able to contain more housing development. It also has the ability to include shops and other facilities without reducing the number of dwellings on the site.

It is in a good location for easy access to the motorway network and airports. It will restrict further traffic congestion in the town centre. There is the opportunity to easily improve the road network north of Woking.

There are a number of employment opportunities in the local area.

The A320 south of Woking is already congested and the development of the Hoe Valley School will make the situation worse.

**Officer Response:**

Whilst the Martyrs Lane site is larger than the six original sites, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Regarding the representation on the provision of facilities and infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The representation relating to transport infrastructure and congestion in other parts of the borough has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 01959/1/001

**Customer Name:** Mrs Kay King

**Summary of representation:**

Wishes to express support for Martyrs Lane and objection to Pyrford development.

Development in Pyrford:

Would ruin the historic escarpment

The village has insufficient infrastructure to cope with additional cars

There are not enough school places in the primary school

It will put pressure on historic sites by increasing traffic flow on adjacent narrow roads

Wildlife will be put under pressure, the fields form part of the village eco corridor and should be protected in the interests of native species of wildlife.

Martyrs Lane can accommodate development and will provide an opportunity to build a new primary school and health centre.

The six original sites can remain as Green Belt

If fully landscaped, then the site could be an attractive housing area and blend in with existing housing provision.

**Officer Response:**

Support for the Martyrs Lane site and objection to development in Pyrford is noted.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The representations relating to reasons against development in Pyrford have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper. In particular the impact of development on landscape, infrastructure including the road network, wildlife and heritage assets.

In addition to the Issues and Matters Topic Paper, the Peter Brett Green Belt Boundary Review recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation on landscape and the escarpment. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant

containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on the provision of infrastructure the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy, Development Management Policies DPD and the Design SPD include robust policies and guidance to make sure that the design of development that will come forward on the safeguarded sites is of high standard and sympathetic to the general character of the area, irrespective of whether the Council safeguards a single site or multiple sites.

Should the Council safeguard land to the east of Martyrs Lane for future development needs, that the Council will amend the Green Belt boundary to reflect this allocation and the six original sites will be retained within the Green Belt. However it should be noted that the

overriding objective of this particular consultation is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternatives.

**Contributor Reference:** 01960/1/001  
**Customer Name:** Mr And Mrs Brian And Carmela Strong

**Summary of representation:**

Agrees to the proposal of safeguarding the land to the East of Martyrs Lane for future development needs.

The site is more able to cope with additional traffic due to the close proximity of major roads. The road network in West Byfleet is already at capacity.

Martyrs Lane contains previously developed land.

Pyrford Green Belt is used for recreational purposes. The Green Belt in Pyrford is an integral part of the heritage setting of the area. The sites are surrounded by heritage assets and features.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet more than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

The Council notes the representation outlining reasons against safeguarding land for future development needs in Pyrford. This will be taken into account to inform the preferred approach to safeguarding. Nevertheless neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in

close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Additionally the Council has addressed the representation regarding amenity and well being and heritage assets in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 02970/1/001  
**Customer Name:** Ms Rachael Wilds

**Summary of representation:**

Objects to development proposals in Pyrford based on the following reasons.

The road infrastructure is not sufficient to cope with additional traffic and the existing road network is at capacity. Development will make the situation worse.

The sites are Green Belt and many local people moved to the area for the semi-rural character of the area and in the knowledge that it would remain as Green Belt.

It is an historic site with the Pyrford Stone adjacent.

The public footpaths would be affected in terms of rural walks.

The semi-rural character of the area would be lost as well as the views.

Additional traffic will be detrimental to the character of the area.

The lifestyle and quality of life for residents will be lost.

Preference to develop land north of the New Zealand Golf Course. It would have minimal impact on the surrounding area as there are few dwellings near by. With the Council refuse disposal site near by, it would have less impact on the life, well being and living standards as developing in Pyrford would have.

The road infrastructure will be able to cater for additional traffic. Therefore the impact on existing residents in the area will be far less severe as the site is out of sight with few residential roads nearby and it has good access to main roads.

**Officer Response:**

Support for the Martyrs Lane site and objection to the Pyrford sites are noted.

The Council notes the representation outlining reasons against safeguarding land for future development needs in Pyrford. This will be taken into account to inform the preferred approach to safeguarding. The representations relating to traffic and congestion, the impact of development on character and landscape, amenity and well being have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding the representation on heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The Council is fully committed to the comprehensive delivery of the Core Strategy. The Core Strategy sets out the Council's case for the release of Green Belt land for development needs and is considered to be consistent with national planning policy. The focus for this particular consultation therefore should be whether the proposed safeguarding of land for future development needs is the most sustainable when compared against other reasonable alternatives. The Council has carried out a number of evidence base documents to underpin the Site Allocations DPD process including the Green Belt boundary review. These documents are all available on the Council's website.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

Whilst the representation notes that development could be accommodated in the northern section of the site, it should be noted that McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the impact of the proposed Martyrs Lane allocation, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

**Contributor Reference:** 01964/1/001  
**Customer Name:** Mr Geoffrey H Parsons

**Summary of representation:**

Support the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040. Some of the reasons for this are as follows:

It is on previously developed land which is not true of the other proposed sites.

The Infrastructure in the other sites such as A245 through West Byfleet & over M25 bridge has virtually no capacity left, especially when other new development in the area is taken into account.

Safeguarding one site for the future housing needs of Woking would probably mean "economies of scale" and would help to find solutions to many of the infrastructure concerns.

The Amenity value of the Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.

The Heritage features of the area which incorporates the two Pyrford fields includes the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a Site of Nature Conservation Interest, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area.

The Landscape in Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance.

The Agriculture of Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

**Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs

Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% (excluding Martyrs Lane site) of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The references to landscape is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed

nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

In terms of the issues raised about the other sites proposed such as Green Belt, infrastructure, character, traffic congestion, these issues have already been addressed in the 'Regulation 18 Consultations Issues and Matters Topic Paper', please refer to section 1.0, 3.0 and 7.0 for the Council's response.

**Contributor Reference:** 01965/1/001  
**Customer Name:** Mr Robert Holmes

**Summary of representation:**

Support for the Martyrs Lane site.

The site was assessed in 2012 and judged to have no risk to merger and sprawl. Much of the land is previously developed after and during the Second World War.

The site has little or no amenity or landscape value. Pyrford sites were identified in the Green Belt boundary review as being in category Major Environmental Constraint and having little or no capacity for change and low capacity for change.

The site would meet the Borough's needs for 1024 dwellings on safeguarded land at a single location. This would provide economies of scale in building and simplify the provision of essential services to the new dwellings.

A major employer in the area is St Peter's Hospital. This site would provide affordable housing for lower paid staff at the hospital, with convenient public transport links.

The site is adjacent to the A320 which has access to Woking town centre and the M25. Whilst it is congested, it can easily be upgraded as it runs through open country with minimal disruption to existing housing. The roads in Pyrford on the other hand pass through built up areas.

The site would allow for the provision of schools, medical and leisure facilities rather than adding pressure on the existing facilities in Pyrford and Byfleet.

Martyrs Lane can provide a viable direction for WBC housing expansion as the area has capacity unlike the other areas of the borough.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

The case officers comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The representation on amenity value has also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Whilst the site area is significantly larger than the six original sites, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to all allocated development sites. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 01966/1/001  
**Customer Name:** Mr George Trow

**Summary of representation:**

Supports the proposed safeguarding of Martyrs Lane for future development needs.

The Green Belt in Pyrford is used for recreational purposes.

The Pyrford sites are good quality farming land that can be used for many centuries.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council has addressed the representation on amenity and well-being in the Regulation 18 consultation Issues and Matters Topic Paper.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

**Contributor Reference:** 01967/1/001

**Customer Name:** B D Harmer

**Summary of representation:**

Has been made aware that there is a possibility of development still being considered on land either side of Upshot Lane.

Strongly object to the proposal. This will increase traffic which is already at capacity and there is no suggestion of additional community services being put in place. There are already capacity issues with West Byfleet Health Centre.

Martyrs Lane is a better solution for development, especially as there will be access to the main Woking road.

The sites in Pyrford should remain as Green Belt.

**Officer Response:**

The purpose of the land to the east of Martyrs Lane consultation is to inform the Council's decision on its preferred safeguarding option. In particular, that the most sustainable sites are identified when compared against all other reasonable alternatives.

The representation regarding transport infrastructure has been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Regarding the road accessibility merits of the Martyrs Lane site, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Site Allocations has been prepared to facilitate the comprehensive delivery of the Core Strategy. The Council is of the opinion that the case for releasing Green Belt land, including

safeguarding land to meet future development needs, has already been established and is consistent with national planning policy. The focus for consideration for the DPD should be about ensuring that the proposed allocations are the most sustainable when compared against other reasonable alternatives.

**Contributor Reference:** 01968/1/001  
**Customer Name:** Mr And Mrs B E Wilson

**Summary of representation:**

The Martyrs Lane site is the only site large enough to include the necessary infrastructure needed to support development, especially education and social care. The roads are already wide enough and should be able to accommodate increase usage. The road network will also be able to support any new schools.

Observation that few people use the site for recreation.

The New Zealand Golf Course should be protected.

Green Belt in Pyrford is used for recreational purposes and has extensive views. The narrow road system is near maximum capacity. The area has no mains drainage and poor social infrastructure including medical facilities.

**Officer Response:**

Whilst the site area for Martyrs Lane is significantly larger than other sites, it should be noted that McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The site currently contains Woodham Court and the New Zealand Golf Course, both of which are currently or have been recently used for recreational purposes. As such, the Council has consulted Sports England as part of the consultation. Their representations will be considered and addressed by the Council separately.

As set out above, the owners of the New Zealand Golf Course have confirmed that the site is not available for development. This will be considered by Members in identifying the Council's preferred safeguarding option.

The merits of the Pyrford Green Belt are noted and have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. This includes matters relating to landscape, amenity and well being and infrastructure provision.

**Contributor Reference:** 01969/1/001  
**Customer Name:** Mr And Mrs Ian Donaldson

**Summary of representation:**

Martyrs Lane would be the ideal site for new housing. Understands that only 1024 homes are needed and therefore there is no requirement to build on the New Zealand Golf Course. A single site would provide the opportunity to deliver the necessary infrastructure, including a health centre and school.

The six previous sites would be unable to support these key services as they are at capacity. By spreading homes across these sites, it would undermine the need to build further infrastructure.

**Officer Response:**

Support for the Martyrs Lane site is noted.

Whilst the Martyrs Lane site is significantly larger than the other sites, it should be noted that McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 01970/1/001  
**Customer Name:** Carl And Linda Stead

**Summary of representation:**

Has seen a significant increasing pressure on local infrastructure in Pырford. Great increase in traffic through Pырford and a complete disregard to improve the road network in the area. This is made worse by increasing the school intake as parking becomes more of an issue.

More housing in Pырford and West Byfleet will make the situation worse. It will call for an expansion of already full schools which is not a feasible option. Therefore support the Martyrs Lane site which is near major roads and can meet the future housing needs. The site could accommodate a new school and health centre, relieving pressure on existing provision and build a road infrastructure that would connect to the other major roads in the area. This is a fair better solution.

A better solution would have been to develop new towns with an infrastructure to fit long term population growth rather than always lagging behind development.

Planners should finally start thinking of affordable housing. It can not be achieved by adding a few hundred houses near Pырford. High rise flats will be required but those sites do not exist in the local area. The Martyrs Lane site could accommodate this type of development.

**Officer Response:**

Representations highlighting the reasons against development in Pырford are noted. Matters relating to traffic and social and community infrastructure have been addressed in the Council's Regulation 18 consultation Issues and Matters Topic Paper.

Although the Martyrs Lane site is of a significant size, it should be noted that McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the

waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios,

including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
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- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst the suggestion of a new town is noted the Council, as part of the Site Allocations DPD process, has not to date identified any sites within the borough capable of accommodating a new town. For information, the Council has considered about 125 alternative sites in total and the outcome of their individual assessments can be found in the Sustainability Appraisal document.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at all of the allocated sites. The Council has carried out a viability

assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. It is therefore incorrect for the representation to suggest that the Council does not have mechanisms in place to facilitate the delivery of affordable housing.

It should also be noted that affordable housing is not limited to flatted developments and that affordable housing also comprises of family accommodation. The Kingsmoor Park development in south Woking is a recent example of affordable family housing being delivered in the borough.

The location of tall buildings, including high rise flats as suggested in the representation, will only be acceptable in specific locations in the Borough. Core Strategy CS1: A spatial strategy for Woking Borough states that in the town centre tall buildings may be acceptable as this location has the best access to services and facilities. Core Strategy Policy CS10: Housing provision and distribution states that in the Green Belt, development should achieve a density range of around 30 dwellings per hectare and therefore high rise flats are unlikely to be acceptable. The Core Strategy, Development Management Policies DPD and Design SPD all provide robust policies and guidance to ensure that development is of the highest standards and respects and enhances local character. This will be taken into account at the development management stage.

**Contributor Reference:** 01919/1/001  
**Customer Name:** Ms Linda Pitkethly

**Summary of representation:**

Support for the Martyrs Lane site is noted.

Objects to principle of large scale development on green fields but feels that Martyrs Lane would be a better alternative to the other sites.

The infrastructure in the area has the capacity to cope with additional development and easier than land in Pyrford. Pyrford Green Belt has amenity, heritage and landscape value. The road network in Pyrford could not cope with additional traffic and road expansion plans would change the historic character of the landscape and ancient network of footpaths. It would also create grid lock in West Byfleet and Ripley.

Land values are lower in Martyrs Lane and therefore the site will be able to deliver more affordable housing. Development in Pyrford would only benefit developers.

**Officer Response:**

Support for the Martyrs Lane site is noted.

Whilst the Council notes the in principle objection to greenfield development, it is fully committed to the comprehensive delivery of the Core Strategy. This includes 4964 net additional homes between 2010 and 2027 as well as a significant amount of retail and commercial floorspace. Whilst most development will take place on brownfield land across the borough, the Council has made the case that some Green Belt land will be required to be released for development. This is set out in detail in the Regulation 18 consultation Issues and Matters Topic Paper.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the

safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding the amenity, heritage and landscape value of the Pyrford sites has previously been addressed by the Council. Again please refer to the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding the road network, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 01920/1/001  
**Customer Name:** Ms Vera Giles

**Summary of representation:**

Objects to development in Pyrford as it is Green Belt land and development would ruin the character of the village. There is no existing infrastructure.

Martyrs Lane has existing road infrastructure in place and is easily accessible.

**Officer Response:**

Objection to Green Belt development noted. The Council's response to the principle of Green Belt development and safeguarding Green Belt land for future development needs has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation on character has also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 01921/1/001

**Customer Name:** Mr Ian Joslin

**Summary of representation:**

The Martyrs Lane site is much closer to major transport links including the M25 and local employers such as St Peters Hospital and employment centres such as Reading, Bracknell, Slough, Staines and Heathrow.

It has no landscape designation unlike Saunders Lane.

The site is largely clear of flooding and much of the land to the north of the site is derelict and has no aesthetic value.

Permission has granted to develop the site, underlining development potential.

Due to the size of the site, a more structured and sensible building policy could be implemented to enable affordable housing and specialist older people accommodation. It could also include provision for Gypsy and Traveller sites as most of the existing sites are in south Woking.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' accordingly are investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a

sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

**Contributor Reference:** 01972/1/001  
**Customer Name:** Ms Stephanie Crowther

**Summary of representation:**

Supports the proposed safeguarding of Martyrs Lane for future development needs.

The site is partly previously developed land unlike the other six sites.

The A245 in West Byfleet and over the M25 has no capacity, especially when future development in the area is taken into account.

One site would deliver economies of scale and would help to find solutions to many of the infrastructure concerns.

Pyrford Green Belt is used for recreational purposes.

The Pyrford Green Belt is part of the heritage setting of Pyrford's historic setting.

Pyrford is protected by Policy CS24 as an escarpment and rising ground of landscape importance.

Pyrford's fields have been farmed for centuries and include good quality agricultural land. They also contribute to the rural character of the area and setting for the southern gateway into the town.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the overriding objective of this consultation is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios,

including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, regardless of what sites are allocated. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. In addition the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

**Contributor Reference:** 01974/1/001  
**Customer Name:** Mr John Attrill

**Summary of representation:**

Objects to development in Pырford Green Belt.

The existing road network is dangerous due to volume and vehicle speeds. Development will make the situation worse.

The views over the local area are beautiful and unique, the development will have an adverse impact on local character.

Air pollution will have a negative impact on the environment.

The road network is congested and development will make the situation worse, blighting the lives of local residents. There is no room for expanding these roads due to development constraints.

The local schools and services are at capacity and unable to cope with an increased population.

Land to the north of the New Zealand Golf Course is more suitable.

It has access to main roads so will avoid hazards to pedestrians, cyclists and motorists.

No beautiful and unique views will be affected.

Easy access to main roads that lead to the M25.

The need for over 3000 dwellings is overstated and so the New Zealand Golf Course should be retained.

Based on the above, the reasons against development in Pырford are compelling and trust that the Council will act in the interests of the environment and local community and identifying a more suitable site such as Martyrs Lane or any other site.

**Officer Response:**

Support for the Martyrs Lane site and reasons for not safeguarding land in Pырford are noted.

The Council has addressed the matters relating to safeguarding land in Pырford in the Regulation 18 consultation Issues and Matters Topic Paper. In particular, the representations relating to road infrastructure and congestion, landscape and social and community infrastructure. In short, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Specifically regarding road infrastructure the Council has undertaken a number of transport studies in preparing the Site Allocations DPD. These studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The environmental implications of the allocations will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

As noted above, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

As set out in the Martyrs Lane Consultation Document, the anticipated capacity of the Martyrs Lane site is at least 1200 dwellings. This figure is broadly similar to the total capacity of the six original safeguarded sites. Whilst the Martyrs Lane site is significantly larger than the other sites, it should be noted that McLaren have made representations to confirm that their land

holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

**Contributor Reference:** 01916/1/001  
**Customer Name:** Ms Heather Spencer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01918/1/001  
**Customer Name:** Ms Louise Pritchard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01922/1/001  
**Customer Name:** Ms Julia Osgerby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01924/1/001  
**Customer Name:** Mr Warren Lee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01928/1/001

**Customer Name:** Mr And Mrs Steven And Lynn Bull

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01929/1/001  
**Customer Name:** Mrs C Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01930/1/001

**Customer Name:** Ms Jane Zeal

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01931/1/001  
**Customer Name:** Mr John Costs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01934/1/001  
**Customer Name:** Jackie Wickens

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01937/1/001  
**Customer Name:** Frances Goode

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01939/1/001  
**Customer Name:** Ms Brenda Oglesby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01941/1/001  
**Customer Name:** Brian Townsend

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01943/1/001  
**Customer Name:** Mr Glenn Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01945/1/001  
**Customer Name:** Mr Derek T Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01946/1/001

**Customer Name:** Ms Ivy Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01949/1/001  
**Customer Name:** Ms Pauline Hamilton–Painting

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01950/1/001  
**Customer Name:** Mr Steve Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01951/1/001  
**Customer Name:** Ms Lucy Edwards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01952/1/001

**Customer Name:** Mr And Mrs Phil And Maxine Gilles

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01953/1/001  
**Customer Name:** Mr Teddy Heffer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01963/1/001  
**Customer Name:** Ms Alison Biggs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01971/1/001

**Customer Name:** Carmel Seear

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01973/1/001

**Customer Name:** Ms Zoe Little

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01975/1/001

**Customer Name:** Lucy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01977/1/001  
**Customer Name:** Mr Derek McCausland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01978/1/001

**Customer Name:** Jo Campbell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01979/1/001  
**Customer Name:** Ms Frances Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01874/1/001

**Customer Name:** Xu Wang

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01875/1/001  
**Customer Name:** Mr James Cruse

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01876/1/001  
**Customer Name:** Ms Chrissie Beddows

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01878/1/001  
**Customer Name:** Ms Sophie Stievet

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01879/1/001  
**Customer Name:** Mr Richard Mace

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01831/1/001  
**Customer Name:** Ms Lisa Hudson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01837/1/001

**Customer Name:** Mr And Mrs Clive And Delia Hobbs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02648/1/001  
**Customer Name:** Mr Alan N Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02649/1/001  
**Customer Name:** Mrs M E Gillard

**Summary of representation:**

- 1) Removal of Green Belt
- 2) Urban Sprawl
- 3) Sustainable development
- 4) Road congestion
- 5) Lack of public transport
- 6) Infrastructure
- 8) Wildlife (protected)
- 9) Achievable development
- 10) Woodland removal
- 11) Flight Paths
- 12) WBC Issues
- 13) Martyrs Lane Recycling Centre
- 14) Canalside Ward
- 15) Natural Woking Policy
- 16) Landscape Assessment

This is a beautiful area, which would be a tragedy to spoil. The Six Crossroads is already like a race track at certain times – how could you consider adding to this?

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01019/4/001  
**Customer Name:** Mr Matthew Pink

**Summary of representation:**

Woodham Lane is already a very busy road along with the A320.

The extra capacity for doctors schools and hospitals for the thousands of people who may live there.

Objects to the building of Woodham New Town.

Recent experience with Runnymede Council, who did not listen to any of our concerns and went ahead and passed it. I hope Woking Council planning are better.

**Officer Response:**

The representation regarding traffic and congestion as well as infrastructure provision have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

Objection to the proposal is noted.

The purpose of the Martyrs Lane consultation is to gather information from the representations to inform the Council's decision on the matter. All representations received will be considered by the Council and will, at Full Council meeting, inform the Council's decision on its preferred safeguarding approach.

**Contributor Reference:** 01882/1/001  
**Customer Name:** Mr Terry Tigwell

**Summary of representation:**

Supports the proposal.

The site is better served by roads e.g. the A320 being a main route from Woking to the M25, Chertsey, St Peters Hospital etc.

There is a direct link to Woking town centre via the A320, whereas the traffic from Saunders Lane route to Woking and the M25 would mean that all traffic would need to use Egley Road. This road is always very busy and with the development of the new School the traffic volume will be greatly increased.

The previous proposal for the Saunders Lane development was not at all suited to the local roads, Saunders Lane being very narrow and unable to take heavy volumes of traffic.

The Martyrs Lane site is large enough to accommodate Woking's total new housing requirements without the need to build on green belt land in the Mayford area. It is also large enough to accommodate the need for Travellers sites.

Martyrs Lane is handily sited for access to the large employers in the area, i.e. Brooklands Park, St Peters Hospital and Heathrow.

**Officer Response:**

Support is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Regulation 18 Consultations Issues and Matters Topic Paper also sets out detailed responses to transport impacts in relation to the original six sites, including those in Mayford – see Sections 3, 20, V and U.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers as set out in the Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites. It should be noted that this will include pitches to meet the accommodation needs of Travellers .

At Regulation 18 stage, officers had recommended to Council that need for Traveller accommodation should be met at Five Acres and Ten Acres. That need is 19 pitches up to 2027. At the Council meeting, Members requested that officers revisit this recommendation and report to them before making a decision about their strategy for Regulation 19 consultation. Officers accordingly are investigating this matter and will be reporting to Council in due course.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 01892/1/001  
**Customer Name:** Ms Stephanie Snashall

**Summary of representation:**

Supports the proposal. Public access to Green Belt here is poor and less valuable in this area. There would be little adverse impact on the existing community. It would be a more economical project and would impact less on the environment. The infrastructure services can be developed from scratch.

**Officer Response:**

Support is noted and the merits of the proposal as set out in the representation will weigh in the balance of considerations by Members.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The Council has carried out two studies to assess whether releasing sites from the Green Belt will undermine the purposes of the Green Belt:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett

The studies conclude that development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt. The land thus has critical importance to the Green Belt.

It is, however, important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

There are potential environmental impacts associated with both the Martyrs Lane site – particularly being located near to the Horsell Common SPA and SSSI – and the six sites originally proposed. However, neither the land east of Martyrs Lane nor the six originally proposed safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

**Contributor Reference:** 01893/1/001  
**Customer Name:** Mr Keith Froom

### **Summary of representation:**

Objects to safeguarding the sites in Pyrford, therefore supports the Martyrs Lane proposal.

Martyrs Lane is a previously developed site. Pyrford's unique semi-rural setting is largely unspoilt with open views to the south. The fields form part of the escarpment. The sites have been farmed for centuries and emphasise the distinctive character of the area highlighted in the Pyrford Neighbourhood Plan.

Martyrs Lane's 3 sites to the north of the golf course are almost unused, partly pre-developed and derelict. There is no landscape element, no known footpaths and the public seem not to use it. The site benefits no one.

Planning permission has been granted for a factory in the northern section of the site. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. Although never developed this demonstrates that its viability as a factory stands and the building of houses is a viable alternative option, based on the reasons given for the McLaren planning permission.

The land also includes a former army camp, disused sports field and general debris. The SCC Waste Site has 7ha of derelict land to the rear. Both sites have been offered for development for several years now.

The 3 sites to the north of the New Zealand Golf Course should have been prioritised by WBC in its initial Regulation 18 Consultation but seem to have been overlooked. It is unacceptable that the six original sites were in the DPD when the previous use and availability of the Martyrs Lane site is considered.

There has been confusion regarding the number of dwellings required to be safeguarded. Only 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an

'EscarPMENT and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

Pyrford Neighbourhood Plan states of this area that 'The area has one particularly ancient tract around the medieval St Nicholas' Church and the escarpment along Warren Lane and Church Hill. It is believed the area represents one of Surrey's last remaining examples of natural beauty, in a farming setting.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

#### **Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

The representations relating to heritage, local character, amenity and landscape have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

Regarding the representation on development viability, the Council through the preparation of the Core Strategy, Community Infrastructure Levy and Site Allocations DPD is confident that development at either of the proposed safeguarded options would achieve positive viability.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding

policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the

six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

The merits of Martyrs Lane site relating to developing a single site are noted and will weigh in the balance of considerations by Members. Nevertheless the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to

manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on the urban boundaries, the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unhelpful to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

**Contributor Reference:** 01894/1/001  
**Customer Name:** Ms Linda Oswick

**Summary of representation:**

Supports the proposal.

Understands the need for more houses that people can afford. The Martyrs Lane site is large enough to accommodate all the housing that is required, whilst providing the necessary infrastructure to support it. The redevelopment of several small sites would require duplication of infrastructure, and overwhelmed village facilities.

**Officer Response:**

Support is noted.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages – in terms of providing affordable dwellings – over each other.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. The Council are continuing to work with infrastructure providers – such as Surrey County Council as transport and education authority and the Clinical Commissioning Groups – to ensure that existing facilities have capacity to accommodate future development; and if not, that additional facilities are provided.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 01910/1/001  
**Customer Name:** Mr Barry Sellick

**Summary of representation:**

Supports the proposal. Preserve heritage features of Pyrford.

**Officer Response:**

Support noted.

Whilst Officers accept that the landscape and heritage features surrounding the sites in Pyrford are highly valued, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by heritage constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy, the Development Management Policies DPD and the Pyrford Neighbourhood Plan include robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise these assets. This includes design policies, which ensure any new developments are designed and masterplanned in such a way that maintain the character of the area in which they are situated.

This issue is addressed in more detail in Section 19 of the Regulation 18 Consultation Issues and Matters Topic Paper.

**Contributor Reference:** 00649/2/001  
**Customer Name:** Mr David M Brighton

**Summary of representation:**

Objects to the proposal. Agrees with the objections made by the "No Woodham New Town" group and by Paul Rimmer of Horsell Common Preservation Society in his letter to the Council's planning officer dated 23 January 2017.

**Officer Response:**

Objection is noted. The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper sets out the Council's response to the issues raised by the Forum. See also the Council's separate response to the Horsell Common Preservation Society representations.

**Contributor Reference:** 01859/1/001  
**Customer Name:** Mr Peter Semon–Ward

### **Summary of representation:**

Objects to the proposal because of:

1. Loss of Green Belt and its trees, woodland, wildlife and its habitat. Saddened if Council decides to replace the Green Belt and wooded land adjacent to Horsell Common SPA and SSSI, and SNCI. Would have a significant detrimental impact upon the environment: local wildlife populations due to loss of habitat but also increase in human intervention such as encroachment and introduction of other wildlife which would not prevail in such landscapes;
2. Transport: traffic on A320 is at breaking point – this would be exacerbated by new road users. The roads are major thoroughfares to the M25, M3 and A3 and when one or more are blocked which is an almost weekly (sometimes daily) occurrence they become bottlenecks and traffic grinds to a halt – this has a knock-on effect to local traffic and through traffic and also harms the environment with increased pollutants released into the atmosphere and increases risks to traffic accidents. This would have a negative effect upon the ability of Ambulances to reach accidents or ability to transport casualties to St Peters Hospital.
3. Public transport: there is insufficient public transport infrastructure to support additional housing. Limited bus services would not be able to serve the increase in population. Car parking would be under severe pressure. Woking Town Centre is already overcrowded and suffering traffic chaos, leading to negative impacts on local businesses and the economy. Woking and West Byfleet train stations would become more busy, creating pressure on car parking facilities. There may be detrimental impacts on local and residential parking on side streets; and more overcrowding on the trains to London.
4. Flood risk: building on land adjacent to the floodplain will lead to increased risk of localised flooding, which will then have a knock-on effect on wildlife and traffic.
5. The golf course has nature conservation value and offers recreational land health benefits. Where will an alternative open space be delivered?
6. The recycling plant is a key local facility which would become over-burdened by additional users; or be subject to pressure to be removed from the area. Any resident would object to having a recycling plant right on their doorstep. This facility should be protected for current users.

Also objects to the Council favouring certain areas at the expense of others – Pyrford, Mayford and West Byfleet have been seen to be given preferential treatment by the Council. The Council are driving wedges between communities and pitting them against each other.

### **Officer Response:**

Objections as set out in the representation are noted and will weigh in the balance of consideration by Members.

Several issues raised in the representation are addressed in detail in the Horsell and Woodham Neighbourhood Forum Issues and Matters Response Topic Paper, including:

- how the loss of Green Belt land will affect the overall integrity of the Green Belt;
- the likely impact of the proposal on designated sites and wildlife, including wildlife within the site and on the golf course;
- the likely impacts of the proposal on the local transport network, and how traffic impacts would need to be mitigated;
- public transport infrastructure, including bus provision and accessibility to the Town Centre and railway station;
- the likely flooding implications of the proposal;
- concerns about the recycling centre;
- concerns about the decision of Councillors and perceived bias.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

Only one section of the golf course falls within the site, and it is unlikely that an entirely new golf course would be delivered in an alternative location. However, any proposal coming forward on this land would be expected to accord with Core Strategy policy CS17 on open space, green infrastructure, sport and recreation, which seeks to retain open space unless certain criteria are met.

Officers would emphasise that it was not the intention of the Council to create tension between communities of the Borough. The Council is required by Planning Regulations to consult with the local community on development plans for the area. This is set out further in the Council's Statement of Community Involvement (SCI) and the Site Allocations DPD consultation statement.

**Contributor Reference:** 01890/1/001  
**Customer Name:** Pauline De Marco

**Summary of representation:**

Supports the proposal, particularly in substitute of the sites in Pyrford.

-The northern section of Martyrs Lane green belt has is of no special significance and has derelict buildings on the site;

-Size of site allows for a large surplus of land for creation of new neighbourhood centre, health, educational and recreational facilities, thereby enhancing employment opportunities.

- Opportunity to provide great range of mix of dwelling types e.g. 1 and 2 bed flats, 2 and 3 bed houses, sheltered housing, disabled housing

- Sufficient surplus land to include landscape features thereby enhancing biodiversity.

- Maximum 3 storey development.

- Crime can be designed out by means of good surveillance.

- Able to redevelop tree nurseries and sports pitches in northern area of site.

- Good access to A320, M25 and Woking.

- Good bus service to Woking and St Peter's hospital.

- New Zealand Golf Course retained.

- Feasible to provide much needed affordable housing for rent and sale.

- Feasible to improve footpaths, cycle tracks and bus routes.

- The present derelict facilities can be designed out.

**Officer Response:**

The merits of the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings, which represents an opportunity for redevelopment. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt (and it is therefore wrong to say that the northern section of the site has no special significance, as it does in fact serve a critical purpose to the Green Belt). The Council's latest evidence carried out by Hankinson Duckett – a landscape assessment of the site which also looked at the northern part of the land – came to a similar conclusion. The New Zealand Golf Course was therefore included in the proposal to ensure that the scale of the site was sufficient to accommodate the amount of housing required taking into account constraints on the land, and also to ensure that any development coming forward in this location would not be unconnected to the existing urban area.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Whilst it is recognised that with a site of this size there would be an opportunity to provide new infrastructure, such as health and educational facilities, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

In terms of housing mix and affordability, it is acknowledged that there would be an opportunity to provide a good range of dwelling types and include a proportion of affordable

housing. However, policies in the Core Strategy would also ensure that appropriate and affordable housing types are delivered on the original six sites, taking into account local need at the time (currently policies CS11: Housing mix; and CS12: Affordable Housing). Similarly in terms of biodiversity, Core Strategy policies would conserve and protect biodiversity assets at any of the allocated sites, and would require development proposals to contribute to the enhancement of existing biodiversity features (currently CS7: Biodiversity and nature conservation). Design policies would also apply, currently CS21, which require proposals for new development to create a safe and secure environment, where the opportunities for crime are minimised, irrespective of whether it is a large, single site or multiple sites.

Accessibility to the A320, and subsequently the M25, and Woking Town Centre is recognised. However, the traffic impacts on these routes of a development of this scale would need to be mitigated. The collective outcomes of various transport assessments carried out by the Council, in partnership with Surrey County Council, demonstrate that existing levels of congestion are likely to be exacerbated. Although all development options at proposed safeguarded sites are expected to exacerbate congestion along the A320 corridor between Woking Town Centre and the M25. In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

**Contributor Reference:** 01847/1/001  
**Customer Name:** Ms Wendy Mullins

**Summary of representation:**

Objects on four grounds:

1. Unacceptable proximity to Horsell Common – threatens its valuable wildlife.
2. A320 unable to cope with existing traffic flows and would become more congested with this development.
3. Lack of infrastructure to cope with such a large development – schools, shops, hospitals etc. and would place pressure on existing inadequate infrastructure.
4. Failure to consider this development alongside Fair Oaks Garden Village.

**Officer Response:**

Objections are noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses some of the issues raised in the consultation in detail, including traffic implications (particularly on the A320), and infrastructure provision.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council also continues to work proactively with its neighbouring boroughs to assess cross-boundary impacts of development proposals, including that at Fair Oaks Airport.

**Contributor Reference:** 02231/2/001  
**Customer Name:** Mr Chan Keaney

**Summary of representation:**

Objects due to the traffic chaos that will be caused by 2000 plus homes.

**Officer Response:**

Objection is noted.

As clearly set out in the Land to the east of Martyrs Lane consultation paper, the site is anticipated to enable the delivery of at least 1,200 net additional homes and the necessary social, physical and green infrastructure to support the potential development of the site. If the Martyrs Lane site is safeguarded by the Council, the exact type and quantum of development will be established during the review of the Core Strategy and or Site Allocations DPD.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses in detail the likely traffic implications of the proposal.

**Contributor Reference:** 01851/1/001  
**Customer Name:** Ms Ingrid Hopson

**Summary of representation:**

Supports the proposal.

One large site can accommodate the necessary infrastructure to make a community. It would be more difficult to include new facilities in the smaller sites. Goldsworth Park was a large development that has worked well.

It is the best option in terms of traffic flow.

There are large employers nearby, and some smaller local employers within the new 'estate' with the new infrastructure.

Building one large site would be more economical.

**Officer Response:**

The merits of developing one large community, with the new infrastructure opportunities this represents, are noted and will weigh in the balance of considerations by Members.

It should be noted that the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of traffic, both safeguarding options will lead to traffic impacts. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating

new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. The Sustainability Appraisal facilitated the selection of the original sites based on this objective. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

**Contributor Reference:** 01855/1/001  
**Customer Name:** Ms Valerie Amos

**Summary of representation:**

Objects to the proposal for the following reasons:

1. The site should have been considered in 2015 in conjunction with the other sites when the housing allocation for the borough was being considered for the plan period of 2027 – 2040.
2. Difficult to consider whether this area of Green Belt should be developed as the Local Plan only shows Green Belt within the Borough's boundaries. The Martyrs Lane site is currently being considered in isolation of the McLaren proposal to the west of the site, and the Fair Oaks proposal in Surrey Heath, even though it is on the boundary of the Borough. If Fair Oaks and this site are developed, the Green Belt would essentially be lost in this area.
3. The urban area of Woking is contained by heathlands, golf courses and farmland. The south eastern boundary of the urban area is more convoluted than the north western boundary, which follows a much straighter line. The Martyrs Lane site breaks this straight line on the map along the north western boundary.
4. The six originally proposed safeguarded sites are situated in roughly 3 locations along the south eastern boundary of the WBC urban area, thereby spreading the impacts these developments bring. They are generally all adjacent to or contained by existing urban areas or semi-rural housing and roads. By substituting these sites for the Martyrs Lane site the impacts are no longer spread around the borough.
5. The Martyrs Lane site is contained by the A320, Woodham Lane and Martyrs Lane. The A320 is extremely busy during rush hour periods with queues already impacting traffic flow at the Six Crossroads Roundabout. It is already difficult to travel south through Woking as the number of crossings over the railway line and canal are limited. The Council should consider the current and future road provision within the borough, before any development takes place. Surrey County Council should be consulted regarding improvements to the A320 and links to the M25 especially if the Fair Oaks proposal goes ahead as well. By containing all the housing allocation at Martyrs Lane the impacts on the A320 and Woodham Lane will be severe. The pressure on the crossings through Woking from this side of town will also be severely impacted.
6. Although the site is close to major employers, it is unlikely that employees would live in the area. A study should be undertaken to ascertain how many of these employees would choose to live in this area of Woking if the houses were within their price bracket. Should the development be approved there should be a guaranteed proportion of truly affordable homes to buy included within the development.
7. The impacts on Horsell Common SSSI and SPA from dog walkers, general recreation and domestic cats would be increased significantly by containing the whole housing allocation in this location even if the development provides alternative recreational areas. The residents of Fair Oaks would also have an impact as there is a direct footpath link to the Common.
8. The planning permission for McLaren's site should not be a material consideration as the permission will lapse and it is no longer to be developed for that purpose.
9. There is a lack of services in this area, with facilities over a mile away. The previous sites were close to existing services and facilities. As part of the planning process, the Council

would need to be assured that sufficient services would be provided to meet the needs of this new area.

**Officer Response:**

Objections are noted and will weigh in the balance of considerations by Members.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD in conjunction with the other sites. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. The Council therefore did consider parts of the land east of Martyrs Lane in previous years.

Officers have access to maps relating to Woking Borough, but recognise that a wider map of the Green Belt may have been of assistance in reaching a view.

It is accepted that a degree of Green Belt land would be lost if both the Martyrs Lane site and Fairoaks site were developed. However, the main consideration is the degree to which this land contributes towards the integrity and purposes of the Green Belt, and whether its loss will undermine these purposes. In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt. It is accepted that urban sprawl may be increased further when taking the Fairoaks proposals into consideration.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to quantify the transport and education provision needed to support the development and how they could be delivered.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

If the Martyrs Lane site were to be removed from the Green Belt, the new boundary would follow the administrative boundary line of the Borough. This would be considered a new, strong and defensible Green Belt boundary line.

The merits of spreading development across the Borough are noted and will weigh in the balance of considerations by Members. The Council selected the original six sites in part due to their reasonable proximity to existing local services and facilities such as shops, schools and health centres, as evidenced by the Sustainability Appraisal (as noted in the representation). It should be noted that there are also merits associated with developing one

single site, such as opportunities to provide new infrastructure (which can also serve the existing surrounding community) as part of any development coming forward. It should also be noted that there are up-to-date and robust policies in the Core Strategy and Development Management Policies DPD that will ensure any impacts of development are mitigated sufficiently be they at one site or multiple sites.

Regarding traffic implications, the Council has carried out a series of separate studies in partnership with Surrey County Council to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the same traffic hotspots, including the A320.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development. The Council will continue to work with the County Council to determine traffic impacts, and mitigation measures required.

The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development both at Martyrs Lane and the six other sites, to ensure that a proportion of dwellings are affordable.

The small portion of the site within the Thames Basin Heaths SPA would not be developed. It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that

important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

The Council agree that the previous planning history of the McLaren site has limited weight. It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding the proposed modifications:

As mentioned above, various sites within the wider Martyrs Lane site were assessed as part of the Strategic Housing Land Availability Assessment (SHLAA) and the Sustainability Appraisal which fed into the Site Allocations DPD work. The sites are within the Green Belt, and so cannot be considered a suitable location for residential development unless they are removed from the Green Belt, as their development would lead to an area of development unconnected

form the urban area. The site has been assessed in the Green Belt boundary review as part of Parcel 2, which had a low capacity for change: "The area to the north [of Parcel 2] is a fine-grained landscape where it will be difficult to accommodate significant change without significant adverse effects on the landscape pattern and features; removal of any of this land would also leave an area of development unconnected to the urban area" (see paragraph 3.5.11). This is why the consultation included the New Zealand Golf Course in the proposal – to ensure any development is connected to the existing urban area. In their representation, the golf course has confirmed that its land will not be made available for safeguarding to meet future development needs as envisaged in the consultation. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs. Therefore even if the land were removed from the Green Belt for a modest housing development as suggested in the representation, the availability of land for development would be an issue. If the Council only developed the previously developed, potentially available parts of land north of the golf course, it would still be unconnected to the urban area and lack reasonable access to existing services and facilities to serve the community.

However, this is not to say that parts of the land could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 01856/1/001  
**Customer Name:** Mrs Barbara Lovejoy

**Summary of representation:**

Supports the proposal.

1. Previously developed land. The Martyrs Lane site is on Green Belt land, some of which has been previously developed – which is not true of the other proposed sites.

2. Infrastructure. The A245 through West Byfleet and over the M25 bridge has no spare traffic density capacity left, especially when other new developments in the area are taken into account.

3. Developing one site for the future housing needs of Woking would probably mean economies of scale and would help solutions to local infrastructure concerns.

4. Amenity value – Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.

5. Heritage – the heritage features of the area around the two Pyrford fields include the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a SNCI, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area.

6. Landscape. Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.

7. Agriculture. Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

**Officer Response:**

The merits of the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

Although some parts of the land are previously developed, the sites are still washed over by the Green Belt designation. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. Peter Brett's Green Belt boundary review report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land (if the Golf Course were not included) would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The conclusion of both studies demonstrate that, despite parts of the site being previously developed, the area makes an important contribution to the purpose of the Green Belt – the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

The Council has worked in partnership with Surrey County Council to study the traffic implications of the various development options. The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features and locally valued landscape features such as footpaths within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage and landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are situated.

**Contributor Reference:** 01857/1/001  
**Customer Name:** Mr Martin Lovejoy

### **Summary of representation:**

Supports the proposal because:

1. Previously developed land. The Martyrs Lane site is on Green Belt land, some of which has been previously developed – which is not true of the other proposed sites.
2. Infrastructure. The A245 through West Byfleet and over the M25 bridge has no spare traffic density capacity left, especially when other new developments in the area are taken into account.
3. Developing one site for the future housing needs of Woking would probably mean economies of scale and would help solutions to local infrastructure concerns.
4. Amenity value – Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.
5. Heritage – the heritage features of the area around the two Pyrford fields include the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a SNCI, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area.
6. Landscape. Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.
7. Agriculture. Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

### **Officer Response:**

The merits of the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

Although some parts of the land are previously developed, the sites are still washed over by the Green Belt designation. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. Peter Brett's Green Belt boundary review report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land (if the Golf Course were not included) would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt. The conclusion of both studies demonstrate that, despite parts of the site being previously developed, the area makes an important contribution to the purpose of the Green Belt – the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

The Council has worked in partnership with Surrey County Council to study the traffic implications of the various development options. The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features and locally valued landscape features such as footpaths within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage and landscape assets of the area. These policies also require new development to respect and make a positive contribution to the character of the area in which they are situated.

**Contributor Reference:** 01862/1/001  
**Customer Name:** Ms Susan Austin

**Summary of representation:**

Supports proposal. The Pyrford sites have very poor road links and minimum infrastructure. Martyrs Lane has good main roads available, and houses would be more enclosed, giving the residents more of a 'village' feel. There would be space to build more community services e.g. health centres, school, and affordable housing.

**Officer Response:**

Support is noted at the merits as set out in the representation will weigh in the balance of considerations by Members.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their location and size.

Finally, it is acknowledged that the Martyrs Lane proposal presents an opportunity to create a new, succinct community. However, development of the originally proposed sites would also offer new residents the opportunity to integrate with existing, established communities and contribute towards their local economy and society.

**Contributor Reference:** 01866/1/001  
**Customer Name:** Mr Norman Ingate

**Summary of representation:**

Supports the proposal, particularly in order for the Pyrford sites to be substituted because:

- the infrastructure in this location is not suitable (including roads for the extra traffic – the roads are very bad between 8–9.30am);
- the school is not large enough;
- insufficient health facilities;
- potential for devaluing properties.

**Officer Response:**

Support is noted, and objections to development at Pyrford sites are noted.

The Regulation 18 Consultation Issues and Matters Topic Paper provides a detailed response to the issues raised in the representation (particularly regarding infrastructure provision at Section 3, traffic impacts at Section 20 and Section U, and health provision at Section M).

The Council is working with Surrey County Council to ensure that future development options will be supported by the necessary physical and social infrastructure, such as transport infrastructure and schools.

It should be noted that recent allocation of school places at Pyrford Primary School demonstrates that places are in fact available to parents who wished their children to attend the school but whose home address was outside the geographical boundary of the parish. This would suggest that a modest capacity exists for any new residents moving to any new development in the area. New development also brings with it the opportunity for new or improved local infrastructure, as identified in the Pyrford Neighbourhood Plan, through the Community Infrastructure Levy and/or on-site provision.

Whilst it is noted that residents are concerned about property values, it should be noted that this is not a material planning consideration. Nevertheless, it is expected that development, regardless of whether it is in Pyrford or other areas of the borough, will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 01877/1/001

**Customer Name:** Mark, Linda, Max, Luke Knowles

**Summary of representation:**

Support the proposal in substitute of developing the sites in Pyrford.

The fields help make Pyrford a village rather than a small town. Along with the beautiful Norman church St Nicholas, they are an important rural part of Surrey, enjoyed by walking families and dog walkers looking at the views. They help get away from the busy roads surrounding Pyrford.

The Martyrs Lane site is more enclosed and relatively unused. Part of it was a military site and not protected greenfield. MPs speaking in the Commons recently said it was unnecessary to build on the Green Belt.

Martyrs Lane has better road access than Pyrford, with the A320. Coldharbour Road – at peak times – suffers bad traffic congestion and lack of parking. Further development here will exacerbate this traffic problem and increase dangers of a child being hurt.

Properties in Pyrford are likely to be priced out-of-reach for many people.

**Officer Response:**

Support for the proposal is noted.

Several of the issues raised in the representation are addressed in detail in the Regulation 18 Consultation Issues and Matters Topic Paper, particularly at Sections 1 and 2 (justification of the release and safeguarding of Green Belt land); traffic implications and assessments of previously identified sites (Sections 20, U and V).

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

Despite being previously developed land in part, they are still covered by the Green Belt designation and must therefore meet the tests set out in the NPPF and the Core Strategy. They were all ruled out in part because their development would lead to isolated development in the Green Belt.

The conclusions of two studies undertaken as part of the Site Allocations DPD preparation process – the Green Belt boundary review and a landscape assessment – assessed land to the

east of Martyrs Lane. The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt, notwithstanding that parts of the site are previously developed.

Whilst Officers accept that the landscape and amenity features of the sites in Pyrford are highly valued, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy, the Development Management Policies DPD and the Pyrford Neighbourhood Plan include robust policies to protect heritage and local landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise these assets. This includes design policies, which ensure any new developments are designed and masterplanned in such a way that maintain the character of the area in which they are situated.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values or location.

**Contributor Reference:** 01900/1/001  
**Customer Name:** Mr Neil Murrin

**Summary of representation:**

Agrees with the proposal.

**Officer Response:**

Support noted

**Contributor Reference:** 01908/1/001  
**Customer Name:** Mr And Mrs Berville

**Summary of representation:**

Agree with the proposal. Previously submitted concerns about the possibility of building homes on the Green Belt land in Pyrford.

**Officer Response:**

Support noted

**Contributor Reference:** 01858/1/001  
**Customer Name:** Mr Nick Hutchins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01860/1/001  
**Customer Name:** Ms Julianne Birch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01861/1/001

**Customer Name:** Mr Phil Birch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01863/1/001  
**Customer Name:** Ms Sandra Faccini

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02935/1/001  
**Customer Name:** Mr Alastair Adams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01865/1/001  
**Customer Name:** Mr Michael Pitts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01867/1/001  
**Customer Name:** Mr Robert Knight

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01868/1/001  
**Customer Name:** Rev Dr Malcolm Johnson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01869/1/001

**Customer Name:** Joe Ephgrave

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01870/1/001  
**Customer Name:** Ms Melanie Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01872/1/001  
**Customer Name:** Mr Keith Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01853/1/001  
**Customer Name:** Mr Keith Hunt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01854/1/001  
**Customer Name:** Ms Sandra Loeffler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01843/1/001  
**Customer Name:** Ms Claire Rhoades–Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01848/1/001  
**Customer Name:** Ms Dawn Dryburgh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01849/1/001  
**Customer Name:** Ms Deborah Pitts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01852/1/001  
**Customer Name:** Ms Chrissie Eggleton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01881/1/001  
**Customer Name:** Mr Colin Lindsay

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01883/1/001

**Customer Name:** Ronnie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01885/1/001  
**Customer Name:** Ms Samantha Bellanca

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01886/1/001

**Customer Name:** Mr Ian Steer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01887/1/001

**Customer Name:** Joe Bellanca

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01888/1/001

**Customer Name:** Mr And Mrs Pamela And Lionel Griffin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01885/2/001  
**Customer Name:** Ms Samantha Bellanca

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01889/1/001  
**Customer Name:** Mr Richard Charles White

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01891/1/001

**Customer Name:** Alex Forbes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01895/1/001

**Customer Name:** Momtchil Roussanov

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01896/1/001

**Customer Name:** Mr Keith Free

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01897/1/001  
**Customer Name:** Anna Marie McSherry-Free

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01898/1/001  
**Customer Name:** Mr A K Restarick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01899/1/001  
**Customer Name:** Ms Susan Croxford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01901/1/001

**Customer Name:** Ms Julie Rowe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01902/1/001

**Customer Name:** Mr Alan Rowe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 01903/1/001  
**Customer Name:** Mr Steve Boon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01905/1/001  
**Customer Name:** Mr Russell Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01906/1/001  
**Customer Name:** Ms Susan Boon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01907/1/001  
**Customer Name:** Mr Philip Ward

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01909/1/001  
**Customer Name:** Mr Geoff Quin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01911/1/001  
**Customer Name:** Ms Suzanne Lock

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01914/1/001  
**Customer Name:** Ms Maria Dovey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01915/1/001

**Customer Name:** Sus

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01873/1/001

**Customer Name:** Jyoti Skelding

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01819/1/001  
**Customer Name:** Ms Alexandra MacInnes

**Summary of representation:**

One large site would make sense– economically and socially. The developer would be better able to programme in schools, shops and GP surgeries in a large site– none of the other sites is big enough for a developer to have to provide these and this would put a strain on existing resources. The site would also be large enough to accommodate traveller sites, and would spread the available sites to allow travellers options north and south of Woking town. The larger site would also make it economically viable to build affordable housing, as well as housing for older adults, and vulnerable groups. Woking is crisscrossed by rail and waterways which produce pinch points for traffic, especially at rush hour. Egle Road in Mayford is at a standstill most mornings even before the Hoe Valley School and leisure centre open. Siting the new development at Martyrs Lane would take traffic to the M25 side of Woking which is where much of the traffic is heading in any event. The land between it and the town centre is suitable to allow the road to be widened/a full carriageway cycle path to be built. In this way, commuters could be encouraged to cycle to the station, and children to cycle to school. Mayford is subject to flooding, and the Martyrs Lane site is not. Avoiding building in Mayford would avoid any exacerbation of the current flood problem, or having to build in flood–amelioration measures, which would raise costs. The land at Martyrs Lane is Green Belt, but has no other designation and part of it is derelict land which has already received planning permission for McLaren to build on, so it is presumably considered suitable for development. Most importantly, the size of the site would mean that Woking could meet Government Requirements for new build homes for many years.

**Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of school, shops and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government Policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is single or multiple sites.

At the Regulation 18 stage Officers had recommended to Council the needs for travellers accommodation should be met at 5 Acres and 10 Acres. The need as determined is 19 pitches up to 2027. At the Council meeting members have requested that Officers re-visit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 Consultation. Officers accordingly are investigating this matter and will report to Council in due course.

In terms of flooding, the land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the assets of the area.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

In terms of roads and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of public transport and access of the site, public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 01807/1/001  
**Customer Name:** Ms Pauline Schlotel

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01835/1/001  
**Customer Name:** Mr Angus MacInnes

**Summary of representation:**

One large site would make sense– economically and socially. The developer would be better able to programme in schools, shops and GP surgeries in a large site– none of the other sites is big enough for a developer to have to provide these and this would put a strain on existing resources. The site would also be large enough to accommodate traveller sites, and would spread the available sites to allow travellers options north and south of Woking town. The larger site would also make it economically viable to build affordable housing, as well as housing for older adults, and vulnerable groups. Woking is crisscrossed by rail and waterways which produce pinch points for traffic, especially at rush hour. Egleby Road in Mayford is at a standstill most mornings even before the Hoe Valley School and leisure centre open. Siting the new development at Martyrs Lane would take traffic to the M25 side of Woking which is where much of the traffic is heading in any event. The land between it and the town centre is suitable to allow the road to be widened/a full carriageway cycle path to be built. In this way, commuters could be encouraged to cycle to the station, and children to cycle to school. Mayford is subject to flooding, and the Martyrs Lane site is not. Avoiding building in Mayford would avoid any exacerbation of the current flood problem, or having to build in flood–amelioration measures, which would raise costs. The land at Martyrs Lane is Green Belt, but has no other designation and part of it is derelict land which has already received planning permission for McLaren to build on, so it is presumably considered suitable for development. Most importantly, the size of the site would mean that Woking could meet Government Requirements for new build homes for many years.

**Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of school, shops and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government Policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is single or multiple sites.

At the Regulation 18 stage Officers had recommended to Council the needs for travellers accommodation should be met at 5 Acres and 10 Acres. The need as determined is 19 pitches up to 2027. At the Council meeting members have requested that Officers re-visit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 Consultation. Officers accordingly are investigating this matter and will report to Council in due course.

In terms of flooding, the land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the assets of the area.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of public transport and access of the site, public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 01824/3/001  
**Customer Name:** Mr Jonathan Mullin

**Summary of representation:**

Objects to the compulsory purchase of Green Belt land and the increasing urbanisation and population density in a area that is saturated particularly with the other new developments Longcross and Fair Oaks. The facilities services and road capacity cannot cope.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01839/1/001  
**Customer Name:** Mr David Askew

**Summary of representation:**

Support the proposal that land to the east of Martyrs Lane to be considered for future housing development. The proposed site is sufficiently large to accommodate a considerable number of dwellings and, most importantly, could also provide the necessary infrastructure in the way of shops and transport links. This would be extremely difficult to the south side of Woking. The Martyrs Lane site's ready access to major employers, to the M25 and to Heathrow Airport would make it a more attractive place to build, rather than in parts of the Borough that are already crowded and which would involve driving through the congested town centre of Woking, where there are frequent delays to traffic.

**Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

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still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

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- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

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- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County

Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 01803/1/001  
**Customer Name:** Ms Emma Faithfull

**Summary of representation:**

Support for the Martyrs Lane proposal and reject the Pyrford site for housing redevelopment.

**Officer Response:**

Support noted

**Contributor Reference:** 01809/1/001

**Customer Name:** Mr And Mrs Sithambaram And J R Jeyam

**Summary of representation:**

Support for Martyrs Lane site because of easy and swift access to Heathrow and Gatwick Airports, West Byfleet and Woking Rail stations and shopping centres in both towns. Bus and cycle routes already exist. A320 to the south of Woking is congested with several existing feeder roads. In contrast, A320 to the north can be developed and will be relatively easier to plan, obtain permission and implement, than in the south. Also St.Peter's Hospital is close by and easy to access. It also provides employment opportunities together with McLaren's Centre and Animal and Plant Health Agency. The site is a single piece of land, large enough to accommodate 1200 or more houses, providing a margin for future needs. The creation of associated shops, schools, and sports/leisure centres will be easier to access as these can all be in one place, reducing the need for residents to travel out for such facilities thus reducing traffic congestion.

This site, though in the green belt, has no other national or local landscape designation. There is some land North of the golf course which is largely disused and derelict and planning permission has previously been given for McLaren to enhance their Centre on part of the site. Therefore, this land may be suitable for further housing or other development, should the need arise. Martyrs Lane development may also contribute in any redevelopment of Sheerwater.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of employment opportunities, it is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. This is true for any of the safeguarded sites.

It is accepted that the Martyrs Lane site does not contain landscape constraints, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal. Parcels of land north of the golf course were assessed as part of the Site Allocations DPD process, and ruled out as their development would lead to isolated development in the Green Belt (see paragraph 3.5.11 of Peter Brett's Green Belt Boundary Review report).

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties.

Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01808/1/001  
**Customer Name:** Ms Karen Muldoon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01811/1/001  
**Customer Name:** Ms Molly Morrissey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01813/1/001  
**Customer Name:** Mr John Morris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01814/1/001  
**Customer Name:** Ms Brenda Hopkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01816/1/001  
**Customer Name:** Mr Michael Daniels

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01817/1/001  
**Customer Name:** Mr Martin Lake

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01818/1/001

**Customer Name:** Mr Neil Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01820/1/001  
**Customer Name:** Mr David Horsnell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01822/1/001  
**Customer Name:** Ms Shirley Horsnell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01823/1/001

**Customer Name:** Dr Latha Parvataneni

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01824/1/001  
**Customer Name:** Mr Jonathan Mullin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01825/1/001  
**Customer Name:** Ms Kim Lafferty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01827/1/001  
**Customer Name:** Ms Karen Weston

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01829/1/001  
**Customer Name:** Mr Richard Whittington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01830/1/001  
**Customer Name:** Ms Binita Singh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01832/1/001  
**Customer Name:** Mr Giovannia Federico

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01834/1/001  
**Customer Name:** Robin Sundaram

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01836/1/001

**Customer Name:** Ms Helen Sundaram

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01838/1/001  
**Customer Name:** Ms Linda Edwards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01840/1/001

**Customer Name:** Mr John Aird

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01841/1/001  
**Customer Name:** Ms Megan Ryder

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01842/1/001  
**Customer Name:** Ms Ruth Cruickshank

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01844/1/001  
**Customer Name:** Ms Poppy Edwards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01845/1/001

**Customer Name:** Mr Gino Izzi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01846/1/001  
**Customer Name:** Mrs Geetha Maheshwaran

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01793/1/001  
**Customer Name:** Ms Joyce Debanks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01795/1/001  
**Customer Name:** Ms Judith Loeffler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01798/1/001  
**Customer Name:** Mr Kieron McMahon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01799/1/001

**Customer Name:** Eden Stone

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01800/1/001  
**Customer Name:** Ms Jane Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01802/1/001  
**Customer Name:** Mr Richard Poole

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01805/1/001  
**Customer Name:** Ms Helen Schlotel

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01806/1/001  
**Customer Name:** Mr Dennis Robins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01833/1/001  
**Customer Name:** Mr Anthony Aldred

### **Summary of representation:**

The site is big enough (112 hectares) to accommodate 1,200 houses, including affordable housing, one or more Gypsy and Traveller sites, and the necessary infrastructure of shops, primary schools, health centre etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones. It is much easier to create the associated infrastructure rather than overloading existing over-stretched facilities. It will also simplify the process for obtaining planning permission

There are major employers close by: St Peter's Hospital, the Animal and Plant Health Agency, McLaren Technology Centre and the Brooklands Retail Park. A new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the north, and to Woking Town Centre and the mainline railway station to the South without encountering the traffic delays where roads cross railway lines. Bus routes and cycle routes, including to Woking Town Centre, exist already. There is little development along the A320 North of Woking, making road widening relatively easy if necessary. This is a better proposal than the option of building South of Woking where the A320 is often at a standstill in the morning rush-hour and that is before the new Hoe Valley School has opened.

4The Martyrs Lane site, although in the Green Belt, has no other National or Local landscape designation unlike some of the other proposals, such as those here at Mayford. There are no Escarpment and Rising Ground Landscape Importance issues such as those faced in GB10, GB11 and GB13.

Most of the site is clear of Flood 2 and Flood 3 designations which should make the planning and development process simpler and more cost effective.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Master planning of the total residential development would allow for the provision of Affordable Housing where the Council's Core Strategy (CS12) states that 35% of all new homes should be Affordable Housing but admits that this target is not being met. In a similar vein, the Council also admits that it is struggling to meet its target for the provision of Specialist Residential Accommodation (CS13) for older people and vulnerable groups as "land values for sites allocated for general residential development can make securing sites for more specialist accommodation difficult in terms of viability and availability." Use of the Martyrs Lane site can help Woking to meet its requirements under CS12 and CS13.

Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking. Currently, almost all other pitches are at the South West side of Woking in Heathlands Ward (Mayford), restricting Gypsy and Traveller choice as to where they can live. Gypsy and Traveller sites would be sustainable by virtue of being within the residential development site and would satisfy CS14, Gypsy and Traveller pitch criteria, which includes the requirement to avoid unacceptable adverse impacts on the visual amenity and character of the area. Gypsy and Traveller pitches included in this residential development would count towards the requirement for Woking Borough Council to find 24 pitches from 2016–2027, and an additional 9 pitches from 2027–2040. Land at Martyrs Lane could easily accommodate one or more Traveller sites to satisfy a target of 15 pitches, thereby removing the Ten Acre Farm (GB7) Traveller site proposal.

Because of the size of the Martyrs Lane area – it is almost twice the size as the six sites it might replace – it should be possible to build all the properties necessary to fulfil Woking's future Housing and Traveller needs, even if it subsequently turns out that more than 1,200 houses are needed, or if there is a further requirement post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

#### **Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

In terms of roads and congestion, The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

In terms of flooding, the land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be

available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government Policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is single or multiple sites.

At the Regulation 18 stage Officers had recommended to Council the needs for travellers accommodation should be met at 5 Acres and 10 Acres. The need as determined is 19 pitches up to 2027. At the Council meeting members have requested that Officers re-visit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 Consultation. Officers accordingly are investigating this matter and will report to Council in due course.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01780/1/001  
**Customer Name:** Ms Ffiona Hesketh

### **Summary of representation:**

There are two main issues regarding sustainability over the proposed site such as the lack of access to services such as health and schools, as well as to local amenities and leisure facilities. The site is somewhat isolated and whilst it may seem easier to replace several smaller developments with one large one, the position of the site throws up a number of very significant issues. In order for this development to succeed it would effectively need to become a locality in its own right with consequent financial, technical and environmental considerations. Does the Borough Council have for example a coherent plan for the capital funding of the necessary services and infrastructure in order for this development to succeed? The previous set of smaller options may have a better chance of success if, due to their smaller scale and location, these significant financial, technical and environmental considerations are less important, and the possibility exists for those developments to integrate more seamlessly to existing localities.

Also the lack of transport infrastructure to accommodate such a large development. Those living there risk being reliant upon private cars, which would not support the development of a vibrant connected community for people of all ages. If the decision to develop part of the Green Belt has already been taken, then it is imperative that the environmental and social impact of building a large number of houses on it, whose only realistic means of transportation are private cars, is taken extremely seriously. The development could have environmental and social issues especially for the young and elderly due to the pollution from cars and lack of other transport options to support social cohesion.

For these reasons, it would be prudent to retain all options including the previous ones that this consultation seeks to replace. Woking must play its part in ensuring there is sufficient housing for the future. However it is not clear how this 'big bang' approach will necessarily be more sustainable than the other approach considered previously.

### **Officer Response:**

In terms of infrastructure, to ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully

assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council has adopted the community infrastructure levy (CIL) as the primary means for securing developer contributions towards strategic infrastructure provision. The levy is set at a rate that will not undermine development viability. A viability assessment has been carried out to demonstrate that residential development across the borough will achieve positive viability. Officers accept that the CIL Charging Schedule will continue to be reviewed in future to take into account new information. Nevertheless, it is not envisaged that the levy will be set at a level that will undermine development viability.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites. However, it has always been very clear to the Council that infrastructure funding has never been and cannot be met entirely by developer contributions. Public sector contributions have and will always be a significant part of infrastructure funding, and the Council works tirelessly with relevant agencies to secure public sector and other sources of funding for infrastructure projects. For example, the CIL Charging Schedule identifies the priority infrastructure to support the delivery of the Core Strategy, how much it will cost, how much of the funding will met from developer contributions and how much is expected to be secured from public sector sources. This gives an indication of the scale of public sector funding expected to help deliver the identified infrastructure.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part

of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to quantify the transport and education provision needed to support the development and how they could be delivered. All other relevant infrastructure and utility providers are also consulted to help assess the infrastructure needs to support future growth. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

In terms of transport and car usage, a key thrust of the transport policies of the Core Strategy and the NPPF are to influence a shift from car based travel to sustainable travel modes such as public transport, walking and cycling. The overall spatial strategy of the Core Strategy is to concentrate most new development at the main centres because they offer a range of key services and facilities to help minimise the need to travel and to encourage sustainable travel modes. Specific references are made to Policies CS1 A spatial strategy for Woking Borough and CS18 Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. These policies have been scrutinised at Examination and judged to be in conformity with the NPPF. In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality. Policy CS18 of the Core Strategy makes this point very clear.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

Transport Assessment (2010)

Cumulative assessment of future development impacts on the highway network (2011)

Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015)

Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016)

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The County Council has also carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

In terms of public transport, Officers would agree that public transport infrastructure currently serving the vicinity of the Martyrs Lane area is relatively limited. However, this would equally be true for most of the other six safeguarded sites. It would therefore be necessary for the Council to work with providers to improve service provision and frequency, if this site were to be safeguarded for future development. As emphasised above, bus services serving the other six safeguarded sites are also relatively limited and their development would equally require measures to improve services in these areas.

In terms of achieving sustainable development, the Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently of the Site Allocations DPD are managed to help achieve sustainable development. The outcome of the appraisal demonstrates that there are a number of negative, positive and neutral impacts for developing the site. The same Sustainability Appraisal Framework had been used to carry out a SA of the originally proposed six safeguarded sites. The SA Framework enables consistent information to be gathered to make comparative judgements between the sites. The Council therefore has significant information to inform decisions about the most sustainable site to safeguard for future development. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

**Contributor Reference:** 01774/1/001  
**Customer Name:** Mr Steven Daley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01765/1/001

**Customer Name:** Mr And Mrs Graham And Margaret Elliot

**Summary of representation:**

Supports the site at Martyrs Lane and objects to building in Pyrford.

**Officer Response:**

Support noted

**Contributor Reference:** 01768/1/001  
**Customer Name:** Ms Judith Mawhood

### **Summary of representation:**

Support for the Martyrs Lane site because it is a previously developed site and the NPPF advises brownfield sites and previously developed sites should be used before Green Belt land. In contrast the two fields in Pyrford have been farmed for centuries and have never been built on. They are an essential component of Pyrford, providing the rural landscape essential to the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The stated objective of the plan is to 'maintain and enhance the area's distinctive and special rural and residential character.' Pyrford's green belt fields are a contributing asset and are used to produce farm crops for either animal feed or bio fuels whereas the Martyrs Lane Land has no current use at all.

In 2012 planning permission was granted for a 60,000 square foot factory in the northern portion of the Martyrs Lane site. This permission was revoked at the request of McLaren. The planning officer in the council, considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. In addition the Army Camp parcel hosted approximately 50 army mizzen huts during the war and was used as emergency housing for about 5 years after the war. The SCC parcel includes an infill site. Today the 3 parcels of land north of the Golf Course comprise semi-derelict facilities, unused, uncared for and overgrown woodland and represents pre-developed land in Green Belt. The sites should have been initially prioritised by WBC

The Site Capacity of 1024 Dwellings compared to the other sites. This was the figure for anticipated capacity published in the original Regulation 18 Consultation conducted in June 2015 and is repeated in the Announcement Letter and Consultation Details for this consultation:

- . Land south of High Road, Byfleet (Proposal GB4 in the draft Site Allocations DPD. Anticipated capacity is 85 dwellings);
- . Land to the south of Murray's Lane, Byfleet (Proposal GB5 in the draft Site Allocations DPD. Anticipated capacity is 135 dwellings);
- . Land to the north east of Saunders Lane, between Saunders Lane and Hook Hill Lane, Mayford (Proposal GB10 of the draft Site Allocations DPD. Anticipated capacity is 171 dwellings);
- . Land to the north west of Saunders Lane, Mayford (Proposal GB11 in the draft Site Allocations DPD. Anticipated capacity is 210 dwellings);
- . Land rear of 79 – 95 Lovelace Drive, Teggs Lane, Pyrford (Proposal GB12 in the draft Site Allocations DPD. Anticipated capacity is 223 dwellings); and
- . Land east of Upshot Lane and south of Aviary Road, Pyrford (Proposal GB13 in the draft Site Allocations DPD. Anticipated capacity is 200 dwellings).

There is no need to build on the Golf Course as the area north of Golf Course totals 36.7 hectares. This is nearly 6 hectares more than the effective area of 31 hectares included in the 6 original sites, after building constraints are considered.

The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford on this criteria. The Brett report considered Pyrford land to be in category Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The parcel is identified as an 'Escarment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford fields.

The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character. The Surrey Landscape Character Assessment says of the land encompassed by parcel 9 'the enclosed farmland, experienced from the public rights of way network, give the area a rural feel.'

Pyrford Neighbourhood Plan states of this area that 'The area has one particularly ancient tract around the medieval St Nicholas' Church and the escarpment along Warren Lane and Church Hill. It is believed the area represents one of Surrey's last remaining examples of natural beauty, in a farming setting.' The Brett Report designated Martyrs Lane as having low capacity for change. The site has no local or national landscape designations. The site has been partially developed in the past and has included both military and civilian dwellings during WWII and in the post-war years.

One larger site of 1024 properties would provide economies of scale, making it easier to resolve infrastructure issues like water, waste, and electricity when compared with the provision of equal services on 6 separate sites spread across the whole borough. Disruption to residents and traffic of a single site would be significantly less than that incurred by 6 separate sites.

The land values of northern sites are much less than the 6 original sites suggested and this facilitates the provision of Affordable Housing. Housing in Pyrford is expensive and more executive type homes will not provide the key worker homes needed by employers such as McLaren and St Peter's Hospital.

There are three large employers close by the Martyrs Lane site – McLaren, Animal & Plant Health Agency and St Peter's Hospital. The latter needs affordable housing for its employees who work shifts and bus 446 passes Martyrs Lane to the hospital.

This selection of Martyrs Lane would allow new and efficient infrastructure to be put in place on the northern sites, potentially avoiding greater costs and providing much needed new facilities. Also there would be no disruption to existing communities which there would be with the original sites. Current plans for West Byfleet area between now and 2027 will mean the

combined plans for Sheer House, Broadoaks and West Hall will already result in approximately 950 new homes in the Pyrford/West Byfleet area.

Summary information compiled from the Surrey County Council (SCC) traffic reports dated 28 January 2015 and 7 September 2016 suggest that the average impact of 900 dwellings at Martyr's Lane based on the 10 "worst" roads or junctions will have less impact on traffic conditions than the development proposed for Mayford, or the combination of developments proposed for Byfleet + Pyrford. Martyrs Lane would alleviate the congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking.

The Martyrs Lane site has the benefit of main road links – Chertsey Road to Woking and in the other direction Chertsey and the M25, also from Woodham Lane there is access to Sheerwater and West Byfleet. Currently, safeguarded sites in Pyrford & Byfleet are accessed by B or C roads. Traffic flow along the A245 through West Byfleet & over M25 bridge is already slow and frequently at a standstill at peak times.

The West Byfleet Health Centre is fully subscribed. With the potential number of new dwellings at Martyrs Lane, there would be an opportunity to build a new health centre and relieve current healthcare resources at West Byfleet facility.

Pyrford Junior School is already full and has taken many pupils from the Maybury area. Martyrs Lane site would be an ideal opportunity to build a new school as part of the development plan.

Martyr's lane already has better bus services than other sites. Currently 446 runs on Chertsey Road until 22:00 in the evening and has a Sunday Service. Buses in Pyrford cease at c18:00, Byfleet at 19:00 and Mayford at 20:00 and there are no Sunday Service. McLaren also operate an employee bus service that could contribute to Martyrs Lane connectivity services and arranging adequate services at one site will be easier than to several dispersed sites.

Green Belt land in Pyrford is very accessible and actively used by walkers, runners, cyclists and others from all across the Borough. By contrast Martyrs Lane is not easily accessible and in comparison rarely used by the public for leisure or recreation, despite its Green Belt status.

The Surrey Landscape Character Assessment describes some of the heritage features of the western section of character area SS10, which includes parcel 9, 'the historic wooded grounds of Pyrford Court are grade II listed, and a Conservation Area covers Pyrford Village. Pyrford Common is designated as a Site of Nature Conservation Interest'. To these features can be added the Aviary Road Conservation Area and the network of ancient footpaths. The two fields are integral to the heritage setting of the area.

Martyrs Lane has limited public footpaths through the area and has no known heritage value. It is not an integral feature of local designated heritage sites referred to in the Hankinson Duckett report such as Church Of All Saints, Grade II listed buildings, 0.4km west of the site.

Thus, Martyrs Lane provides a viable direction for WBC housing expansion, which would provide new homes in an area which has capacity and is a more compelling option than trying

to further overload the areas encompassed by the 6 original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

**Officer Response:**

Support is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

In terms of heritage and amenity, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy

that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 01769/1/001  
**Customer Name:** Mrs Christine Pring

**Summary of representation:**

Supports Martyrs Lane site and not the Pyrford sites. There is no need to build on the Golf Course as only 1024 houses are required not 3000/3500.

A single site at Martyrs Lane will provide greater economy to address the many infrastructure issues concerning the original six sites and additional community services such as a new Health Centre, First School and affordable housing.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of

infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 01771/1/001  
**Customer Name:** Mr Michael Garrett

**Summary of representation:**

Support the Martyrs Lane site as it would have a lesser impact if housing is imperative.

**Officer Response:**

Support noted and in terms of housing needs, this issue has already been addressed in the 'Regulation 18 Key issues and matters Paper', please refer to section 1.0 for the Council's response.

**Contributor Reference:** 01775/1/001  
**Customer Name:** Ms Elizabeth Maguire

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01777/1/001  
**Customer Name:** Ms Gill Dodgin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01778/1/001  
**Customer Name:** Ms Maria Croome

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01782/1/001  
**Customer Name:** Mr Kevin Hewson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01783/1/001  
**Customer Name:** Mr Harry Jeffery

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01784/1/001  
**Customer Name:** Mr Michael Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01786/1/001  
**Customer Name:** Ms Patricia T Ronnson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01787/1/001

**Customer Name:** Sirfraz Ellahi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01789/1/001  
**Customer Name:** Ms Louise Rozee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01791/1/001

**Customer Name:** Ms Ruth Aldis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01792/1/001

**Customer Name:** Mr Nick Aldis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01755/1/001  
**Customer Name:** Ms Karen Elliott

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01757/1/001  
**Customer Name:** Ms Diana Haynes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01758/1/001  
**Customer Name:** Mr Nick Haynes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01759/1/001  
**Customer Name:** Mr Nigel Sutcliffe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01760/1/001  
**Customer Name:** Ms Deborah Leigh-Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01761/1/001  
**Customer Name:** Ms Clare Cross

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01762/1/001  
**Customer Name:** Elspeth Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01764/1/001  
**Customer Name:** Mr Dominic Lawson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01766/1/001  
**Customer Name:** Mr Dean Paterson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01767/1/001

**Customer Name:** Ms Leanne Paterson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01772/1/001  
**Customer Name:** Ms Susanna Jeffery

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01773/1/001  
**Customer Name:** Mr Nigel Hutton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01756/1/001  
**Customer Name:** Mr Tony Jacob

**Summary of representation:**

Support the Martyrs Lane site as a single site for safeguarded development land and still objects to the sites in Pyrford. The New Zealand Golf Club should be retained and should be taken out of the site boundary.

**Officer Response:**

Support for Martyrs Lane Site is noted.

The site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

In terms of removing the Golf Club from the site boundary, parcels of land north of the golf course were assessed as part of the Site Allocations DPD process, and ruled out as their development would lead to isolated development in the Green Belt (see paragraph 3.5.11 of Peter Brett's Green Belt Boundary Review report).

The merits of the New Zealand Golf Club as set out in the representation are noted and will be considered by the Council. The membership nature of the Golf Club is not a material Planning consideration.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The Council will make it an essential requirement for the site to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform

decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

**Contributor Reference:** 01750/1/001

**Customer Name:** M Rivett

**Summary of representation:**

Strongly objects to the proposals, as a Member of Horsell Common Preservation Society. Endorses the objections submitted to the Council by the Society.

**Officer Response:**

Objection is noted. The Council has responded in detail to the representation submitted by the Horsell Common Preservation Society, which can be accessed for further information.

**Contributor Reference:** 01735/1/001  
**Customer Name:** Mr Ronald Cook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01754/1/001  
**Customer Name:** Mr David Boorman

**Summary of representation:**

Supports the proposal. Seems like a sensible plan.

**Officer Response:**

Support noted

**Contributor Reference:** 01770/1/001  
**Customer Name:** Mr Stephen Shepherd

**Summary of representation:**

Supports the proposal. Preferable to original proposals and in particular any development either side of Upshot Lane.

**Officer Response:**

Support for the Martyrs Lane proposal is noted.

**Contributor Reference:** 01596/2/001  
**Customer Name:** Mr Daryl Jordan

**Summary of representation:**

Objects to the proposal. The additional households will need transport to their place of work, to a train station, to school etc and the surrounding roads, including the main route to the motorway and A roads, are already too busy. There are not enough amenities. Existing residents will suffer.

**Officer Response:**

Objection is noted. The Woodham and Horsell Neighbourhood Forum Issues and Matters Topic Paper addresses the issues raised in the representation in detail, including the likely impacts on transport infrastructure (such as the A320), accessibility of railway stations, and provision of social infrastructure.

It is expected that development, regardless of whether it is at Martyrs Lane or the original six sites, will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 01776/1/001

**Customer Name:** Mr And Mrs Nick And Jan Kamburoff

**Summary of representation:**

Supports the development of land north of the golf club as a single site as the most economical use of rate payers funds, rather than multiple sites in the area – in particular, against development of Upshot Lane fields due to inadequate local services, including roads, for such a large development.

**Officer Response:**

Support of the proposal is noted.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure, whatever the development might be. This will be the case irrespective of whether it is a single site or multiple sites. The Council is satisfied that the sites can be developed with the necessary infrastructure to support their sustainable delivery. Section 3 of the Regulation 18 Consultation Issues and Matters Topic Paper provides more detail.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. The Topic Paper referred to above sets out a detailed response (under paragraph 3) to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

It should be noted that McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of

about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 01781/1/001  
**Customer Name:** Mrs B A Wingate

**Summary of representation:**

Supports the proposal.

Good access to Chertsey and the M25.

Opportunity to provide new infrastructure: schools, local shops, doctor surgery. New roads can be planned for the safety of children.

Better than trying to squeeze properties into the other sites.

**Officer Response:**

Support is noted and the merits of the proposal as set out in the representation will be weighed in the balance of considerations by Members.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure (including transport infrastructure), wherever the development might be. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Accessibility from the Martyrs Lane site to Chertsey and the M25 is noted. However, it is important that new development at this location does not reduce accessibility in terms of worsening traffic and congestion. A series of transport assessments commissioned by the Council confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

It should be noted that the Council has a number of planning policies and best practice guidance in place to ensure that future development is of the highest standards and reflects local character. Through careful masterplanning it is not considered that properties will be squeezed into the sites, as suggested in the representation.

**Contributor Reference:** 01815/2/001  
**Customer Name:** Mr And Mrs Geoff And Jean Plowman

**Summary of representation:**

Objects to the proposal: the site is too large. Development on the smaller sites would be more easily absorbed into those areas.

Horsell Common is a unique SSSI and one of the few remaining areas of heathlands in the south east of England. Development would be detrimental to such a precious area.

**Officer Response:**

Objection is noted, and comments will weigh in the balance of considerations by Members.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

**Contributor Reference:** 01788/1/001  
**Customer Name:** Mr Ian Marshall

**Summary of representation:**

Objects to the proposal as it is Green Belt land and the Housing White Paper reiterated the Government's promise to protect the Green Belt, saying it could only be built on in "exceptional circumstances". Explain the exceptional circumstances that would allow this plan to proceed.

**Officer Response:**

The exceptional circumstances justifying the release of Green Belt land are explained in detail in the Regulation 18 Consultation Issues and Matters Topic Paper. See Sections 1 and 2.

Whilst it is acknowledged that the Housing White Paper reiterates the Government's commitment to protecting the Green Belt, it should be noted that the white paper does not set out any significant change to national Green Belt policy that is not already within the NPPF. The Woking Core Strategy was at public examination, considered against the policies of the NPPF and deemed 'sound' by the examination inspector.

**Contributor Reference:** 01797/1/001  
**Customer Name:** Ms Arietta Gaazenbeek

**Summary of representation:**

Strongly objects to proposal. Nature should be kept intact rather than building more houses. The volume of housing would be too much in such a beautiful area, which will in turn increase the traffic in Woodham and Woking greatly.

**Officer Response:**

Objection is noted.

The Council recognises the challenge of planning and distributing development that meets the community's needs, whilst preserving and enhancing the biodiversity features of the Borough. Most of the new development will be directed to previously developed land in the town, district and local centres, and will be fully assessed to ensure it does not adversely impact on sensitive environmental areas. However, these sites are limited between 2022 and 2027 and beyond, so areas of Green Belt have been identified as a broad location for growth to sufficiently meet housing need in the future. The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail the justification for releasing Green Belt, and explains how the methodology has attempted to select Green Belt locations which contribute the least towards the purpose of the Green Belt (see Sections 1 and 2).

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper sets out the Officers' views on traffic implications of the proposal.

**Contributor Reference:** 01826/1/001  
**Customer Name:** Ms Sheila Dorkings

**Summary of representation:**

Supports the proposal as the area is far less populated and likely to cause less objections to future development, unlike the overpopulated Byfleet, Mayford and Pyrford areas which are already well developed with little room to provide the necessary extra schools and facilities to serve the development.

**Officer Response:**

Support is noted.

It is envisaged that planning to meet the housing need for the Borough should not undermine the overall social fabric of the area. There is no doubt that the development of sites will increase the population of some wards/areas. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development.

The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the consultation on the Martyrs Lane site has attracted a similarly large response to the consultation process about the previously identified sites.

**Contributor Reference:** 01794/1/001  
**Customer Name:** Mr Nick Hemmant

### **Summary of representation:**

Supports the proposal.

#### **1. Previously developed land**

The Pyrford fields have been farmed for centuries and never been built on. These Green Belt fields are an essential component of Pyrford, providing rural landscape essential to the semi-rural character of the area, as per the Pyrford Neighbourhood Plan. The stated objective of the plan is to 'maintain and enhance the area's distinctive and special rural and residential character.' In contrast, the Martyrs Lane site has no current use and comprises semi-derelict facilities, unused woodland and is previously developed. Planning permission has been granted for a factory in the northern portion of the site. Mr Freeland, an experienced planning officer in the council, considered the impact on the Green Belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. In addition the Army Camp parcel hosted approximately 50 army mizzen huts during the war and was used as emergency housing for about 5 years after the war. The SCC parcel includes an infill site.

#### **2. Site capacity – 1024 dwellings**

The only credible figure for the purpose of the consultation is 1024 as per the consultation document, rather than figures being discussed up to 3500.

#### **3. Building on the golf course is unnecessary**

The area north of NZGC totals 36.7 hectares. This is nearly 6 hectares more than the effective area of 31 hectares included in the 6 original sites, after building constraints are considered. Therefore there is no need to build on New Zealand Golf Course (NZGC) in order to satisfy the requirement for 1024 dwellings on land safeguarded for development in the period 2027–2040.

#### **4 Green Belt Constraint**

The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford on this criteria.

#### **5. Environmental constraints**

The Brett report considered Pyrford land to be in category Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The parcel is identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford fields.

#### **6. Landscape character and sensitivity to change**

The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character. The Surrey Landscape Character Assessment says of the land encompassed by parcel 9 'the enclosed farmland, experienced from the public rights of way network, give the area a rural feel.'

Pyrford Neighbourhood Plan states of this area that 'The area has one particularly ancient tract around the medieval St Nicholas' Church and the escarpment along Warren Lane and Church Hill. It is believed the area represents one of Surrey's last remaining examples of natural beauty, in a farming setting.'

The Brett Report designated Martyrs Lane as having low capacity for change. The site has no local or national landscape designations. The site has been partially developed in the past and has included both military and civilian dwellings during WWII and in the post-war years.

#### 7. Economic and social benefit

One larger site would provide economies of scale – easier to provide infrastructure than servicing six separate sites. Less disruption to residents and traffic during construction.

Land values at Martyrs Lane site are less than the six original sites and would therefore facilitate affordable housing. Housing in Pyrford is expensive and more executive type homes will not provide the key worker homes needed by employers such as McLaren's and St Peter's Hospital.

There are three large employers close by the Martyrs Lane site – McLaren, Animal & Plant Health Agency and St Peter's Hospital. The latter needs affordable housing for its employees who work shifts and bus 446 passes Martyrs Lane to the hospital.

#### 8. Infrastructure

Infrastructure provision for a single large site easier and more cost-effective than across six sites, with little disruption to existing community (unlike original sites). Current intentions for West Byfleet area pre 2027 will mean substantial deterioration of highways movement and between them Sheer House, Broadoaks and West Hall will result in approximately 950 new homes which is more than enough for the Pyrford/ West Byfleet area.

Summary information compiled from the Surrey County Council (SCC) traffic reports dated 28 January 2015 and 7 September 2016 suggest that the average impact of 900 dwellings at Martyr's Lane based on the 10 "worst" roads or junctions will have less impact on traffic conditions than the development proposed for Mayford, or the combination of developments proposed for Byfleet + Pyrford. Martyrs Lane would alleviate the congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking.

The Martyrs Lane site has the benefit of main road links – Chertsey Road to Woking and in the other direction Chertsey and the M25, also from Woodham Lane there is access to Sheerwater and West Byfleet.

Currently, safeguarded sites in Pyrford & Byfleet are accessed by B or C roads. Traffic flow along the A245 through West Byfleet & over M25 bridge is close to theoretical maximum.

The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to the A320.

The West Byfleet Health Centre is fully subscribed. With the potential number of new dwellings at Martyrs Lane, there would be an opportunity to build a new health centre and relieve current healthcare resources at West Byfleet facility.

Pyrford Junior School is already full and has taken many pupils from the Maybury area, Martyrs Lane site would be an ideal opportunity to build a new school as part of the development plan.

Martyr's lane already has better bus services than other sites. Currently 446 runs on Chertsey Road until 22:00 in the evening and has a Sunday Service. Buses in Pyrford cease at c18:00, Byfleet at 19:00 and Mayford at 20:00 and there are no Sunday Service. McLaren also operate an employee bus service that could contribute to Martyrs Lane connectivity services and arranging adequate services at one site will be easier than to several dispersed sites.

#### 9. Amenity and heritage

Green Belt land in Pyrford is accessible and actively used by walkers, runner, cyclists and others from across the Borough. Martyrs Lane is not easily accessible and in comparison is rarely used by the public. It is an enclosed site and not utilised for leisure or recreation.

There are heritage assets around the Pyrford sites: Pyrford Court, Pyrford Village Conservation Area, Pyrford Common is an SNCI. Aviary Road Conservation Area and ancient footpaths are also nearby. The two fields are integral to the heritage setting of the area. Martyrs Lane site does not have heritage value and has limited footpaths in the area. It is not an integral feature of local designated heritage sites referred to in the Hankinson Duckett report such as Church Of All Saints, Grade II listed buildings, 0.4km west of the site.

#### 10. Other planning considerations

The site is well-contained by urban boundaries to the north and west. The entire 112ha provides a viable, new Green Belt boundary but there is not requirement to allocate all the land for housing.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the 6 original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

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Support is noted.

Regarding previously developed land, site capacity and avoidance of the golf course: Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

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They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

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It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all

other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

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The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Regarding economic and social benefits:

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

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Regarding roads:

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- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding amenity and heritage:

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

**Contributor Reference:** 01796/1/001  
**Customer Name:** Ms Gina Hemmant

### **Summary of representation:**

Supports the proposal.

#### **1. Previously developed land**

The Pyrford fields have been farmed for centuries and never been built on. These Green Belt fields are an essential component of Pyrford, providing rural landscape essential to the semi-rural character of the area, as per the Pyrford Neighbourhood Plan. The stated objective of the plan is to 'maintain and enhance the area's distinctive and special rural and residential character.' In contrast, the Martyrs Lane site has no current use and comprises semi-derelict facilities, unused woodland and is previously developed. Planning permission has been granted for a factory in the northern portion of the site. Mr Freeland, an experienced planning officer in the council, considered the impact on the Green Belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. In addition the Army Camp parcel hosted approximately 50 army mizzen huts during the war and was used as emergency housing for about 5 years after the war. The SCC parcel includes an infill site.

#### **2. Site capacity – 1024 dwellings**

The only credible figure for the purpose of the consultation is 1024 as per the consultation document, rather than figures being discussed up to 3500.

#### **3. Building on the golf course is unnecessary**

The area north of NZGC totals 36.7 hectares. This is nearly 6 hectares more than the effective area of 31 hectares included in the 6 original sites, after building constraints are considered. Therefore there is no need to build on New Zealand Golf Course (NZGC) in order to satisfy the requirement for 1024 dwellings on land safeguarded for development in the period 2027–2040.

#### **4 Green Belt Constraint**

The Brett Woking Green Belt report stated that Parcel 9 (which includes the two fields in Pyrford) has very low suitability for removal from the green belt. This category is described as land fundamental to the green belt. Martyrs Lane is categorised as having low suitability and should therefore be selected before the fields in Pyrford on this criteria.

#### **5. Environmental constraints**

The Brett report considered Pyrford land to be in category Major Environmental Constraint. The land is classified as grade 3 agricultural with some grade 2. The parcel is identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford fields.

#### **6. Landscape character and sensitivity to change**

The Brett report considered Pyrford land (parcel 9) to fall into categories – little or no capacity for change and low capacity for change. The area is considered to have a strong unspoilt rural character. The Surrey Landscape Character Assessment says of the land encompassed by parcel 9 'the enclosed farmland, experienced from the public rights of way network, give the area a rural feel.'

Pyrford Neighbourhood Plan states of this area that 'The area has one particularly ancient tract around the medieval St Nicholas' Church and the escarpment along Warren Lane and Church Hill. It is believed the area represents one of Surrey's last remaining examples of natural beauty, in a farming setting.'

The Brett Report designated Martyrs Lane as having low capacity for change. The site has no local or national landscape designations. The site has been partially developed in the past and has included both military and civilian dwellings during WWII and in the post-war years.

#### 7. Economic and social benefit

One larger site would provide economies of scale – easier to provide infrastructure than servicing six separate sites. Less disruption to residents and traffic during construction.

Land values at Martyrs Lane site are less than the six original sites and would therefore facilitate affordable housing. Housing in Pyrford is expensive and more executive type homes will not provide the key worker homes needed by employers such as McLaren's and St Peter's Hospital.

There are three large employers close by the Martyrs Lane site – McLaren, Animal & Plant Health Agency and St Peter's Hospital. The latter needs affordable housing for its employees who work shifts and bus 446 passes Martyrs Lane to the hospital.

#### 8. Infrastructure

Infrastructure provision for a single large site easier and more cost-effective than across six sites, with little disruption to existing community (unlike original sites). Current intentions for West Byfleet area pre 2027 will mean substantial deterioration of highways movement and between them Sheer House, Broadoaks and West Hall will result in approximately 950 new homes which is more than enough for the Pyrford/ West Byfleet area.

Summary information compiled from the Surrey County Council (SCC) traffic reports dated 28 January 2015 and 7 September 2016 suggest that the average impact of 900 dwellings at Martyr's Lane based on the 10 "worst" roads or junctions will have less impact on traffic conditions than the development proposed for Mayford, or the combination of developments proposed for Byfleet + Pyrford. Martyrs Lane would alleviate the congestion likely in West Byfleet from traffic emanating from the 6 separate sites across Woking.

The Martyrs Lane site has the benefit of main road links – Chertsey Road to Woking and in the other direction Chertsey and the M25, also from Woodham Lane there is access to Sheerwater and West Byfleet.

Currently, safeguarded sites in Pyrford & Byfleet are accessed by B or C roads. Traffic flow along the A245 through West Byfleet & over M25 bridge is close to theoretical maximum.

The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to the A320.

The West Byfleet Health Centre is fully subscribed. With the potential number of new dwellings at Martyrs Lane, there would be an opportunity to build a new health centre and relieve current healthcare resources at West Byfleet facility.

Pyrford Junior School is already full and has taken many pupils from the Maybury area, Martyrs Lane site would be an ideal opportunity to build a new school as part of the development plan.

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The site is well-contained by urban boundaries to the north and west. The entire 112ha provides a viable, new Green Belt boundary but there is not requirement to allocate all the land for housing.

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Support is noted.

Regarding previously developed land, site capacity and avoidance of the golf course: Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

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Regarding roads:

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**Contributor Reference:** 01729/1/001  
**Customer Name:** Dayanand Patil

**Summary of representation:**

Green Belt east of Martyrs Lane must be protected.

**Officer Response:**

Objection noted. The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper responds to this issue in detail.

**Contributor Reference:** 01733/1/001  
**Customer Name:** Mr Mark Jones

### **Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, Traveller accommodation and the necessary social and community infrastructure needed to support it. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is within Flood Zone 1 and therefore make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Masterplanning of the site would allow for the provision of affordable housing which is needed in the Borough as the Council is currently not meeting its targets. The site would also be able to accommodate specialist residential accommodation for older people and vulnerable groups.

The site could provide Gypsy and Traveller accommodation for those wishing to live in the east of Woking. All sites are currently in the southwest of the borough. This would also meet the requirements of Policy CS14 and meet Woking's current and future Traveller accommodation needs. Ten Acre Farm can therefore be removed as a Traveller site proposal.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and

- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all

ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' accordingly are investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01731/2/001  
**Customer Name:** Mr Anthony Saunders

**Summary of representation:**

Objects to the proposal because:

- Together with nearby proposed residential developments, it would create an unsustainable area of housing unsupported by infrastructure of the area;
- The A320 and A245 are unable to support additional traffic, taking into account expansion of McLaren factory too;
- No necessary extra infrastructure provision such as hospital, GP, schools;
- Green Belt should be protected from further incursions;
- Services of Woking already suffer unmanageable pressure. Development of the proposed scale will turn Woking into a metropolis. This is not wanted by the majority of residents. Tower blocks in the town centre have already increased the population substantially. More will be built in the near future.

**Officer Response:**

Objections are noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper have addressed several issues raised by the representation, including infrastructure and transport implications of the proposal. The Topic Paper also sets out Officers' response regarding the Green Belt impacts of the proposal, taking into account findings from landscape assessments commissioned by the Council.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail the justification for release of Green Belt to meet future housing need (see Sections 1 and 2). It also sets out how future development will be supported by the necessary infrastructure, taking into account all expected development coming forward in the Core Strategy and beyond (see Section 3).

As set out in Core Strategy Policy CS1: A spatial vision for Woking Borough and Policy CS2: Woking Town Centre, the Council will support tall buildings in the town centre as it is the most sustainable location within the Borough. Whilst development will in turn increase the population of the town centre, it is expected to continue to provide a wide range of services and facilities to support the population.

**Contributor Reference:** 01749/2/001  
**Customer Name:** Mr John Bradbury

**Summary of representation:**

Objects to the proposal. New dwellings should be spread across the Borough rather than focussed in one place, in an area which can barely cope with the current traffic let alone any new housing.

**Officer Response:**

Objection is noted. The Horsell and Woodham Neighbourhood Forum Issues and Response Topic Paper addresses the issues raised by the representation in detail. It sets out findings of transport assessments and Officers views about the impact of the proposal, and more general infrastructure provision.

**Contributor Reference:** 01731/1/001  
**Customer Name:** Mr Anthony Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01732/1/001  
**Customer Name:** Mr Andrew Sharples

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01738/1/001

**Customer Name:** Mr Ian Moore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01739/1/001  
**Customer Name:** Ms Cara Lawler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01740/1/001  
**Customer Name:** Holger Marsen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01741/1/001

**Customer Name:** Catherine

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01742/1/001

**Customer Name:** Ms Marisa Blagden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01743/1/001  
**Customer Name:** Ms Joanne Bennett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01744/1/001  
**Customer Name:** Ms Kate Golding

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01745/1/001  
**Customer Name:** Ms Katherine Kennedy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01746/1/001  
**Customer Name:** Mr Stephen Barklem

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01747/1/001  
**Customer Name:** Mr Raymond Griffith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01748/1/001  
**Customer Name:** Mr Brett Goslett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01752/1/001

**Customer Name:** Mr Lee Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01753/1/001  
**Customer Name:** Mr Peter Fraser

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01763/1/001  
**Customer Name:** Ms Fiona Cefai

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01785/1/001

**Customer Name:** Mr Ian Ward

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01790/1/001  
**Customer Name:** Mr Chris Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01801/1/001  
**Customer Name:** Mr Jeremy Kenward

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01804/1/001  
**Customer Name:** Mrs Margaret Brady

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01810/1/001  
**Customer Name:** Maurice Court

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01812/1/001  
**Customer Name:** Ms Helen Barrett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01815/1/001

**Customer Name:** Mr And Mrs Geoff And Jean Plowman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01821/1/001

**Customer Name:** Beth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01734/1/001  
**Customer Name:** Mr David Shuttleworth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01751/1/001  
**Customer Name:** Ms Lyndsey Davies

**Summary of representation:**

Objects to the proposal. The Green Belt land is what makes Woking such a beautiful place to live.

There will be an impact on the rail and road networks. Trains are overcrowded which will become worse with the addition of new homes. Similar on the roads. A limited service is provided as it is, despite the high train fares and council tax.

There will be an impact of local schools and children's clubs. There will be more fighting over available places. Our future generations will struggle to be educated or join in extra-curricular activities.

The land is rich in biodiversity, which will be lost for future generations.

**Officer Response:**

Objections are noted.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail the justification for releasing Green Belt land (see Sections 1 and 2), and how sites have been selected which make the lowest contribution to the purposes of the Green Belt.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper sets out in detail how the transport and infrastructure implications of the proposal have been considered, including likely impacts on local roads, access to railway stations, impacts on biodiversity and provision of local facilities such as schools.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure, whatever the development might be. This will be the case irrespective of whether it is a single site or multiple sites. The Council is satisfied that the sites can be developed with the necessary infrastructure to support their sustainable delivery.

**Contributor Reference:** 02669/1/001  
**Customer Name:** Mrs Rosemary Solari

**Summary of representation:**

Supports the proposal as it has potential for building the infrastructure required for a new village, with access to the motorway and train stations.

**Officer Response:**

Support is noted. The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Accessibility of the site to the motorway is acknowledged, but development of this scale would likely lead to impacts on the highway. The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options, and they are all likely to exacerbate existing levels of congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 01640/1/001  
**Customer Name:** Mr Dave Teague

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01679/1/001  
**Customer Name:** Mr James Prout

**Summary of representation:**

Objects to the proposal.

Spreading new developments around the borough spreads the impact on schools, GP surgeries, transport infrastructure. It also provides market differentiation in terms of how the dwellings will be valued owing to the varied locations. It is also fairer on neighbouring properties. Vast developments of a similar magnitude, e.g. Goldsworth Park, don't really integrate well with existing communities – they create their own.

Flooding would be an issue. Natural soakaway would be replaced with concrete/tarmac. Areas prone to flooding will worsen with climate change.

The worst impact will be traffic congestion. This will affect the attractiveness of the Borough as a place to work and live. With no real alternative to the A320, nor any immediate likelihood of another tunnel/bridge to traverse the railway line, focusing more traffic in this area will dissuade employers moving to the area. Revoking McLaren's planning consent (whether or not they intend to use it) will not be welcome.

Martyrs Lane and Fair Oaks developments will alter the rural nature of the housing around Horsell Common irrevocably, although at least Fair Oaks is a previously developed site.

Build on the original sites, focusing on low cost and a percentage of multi-tenanted properties, and examine areas where small pockets of housing can be developed incrementally to meet the need. Revisit the plan in 2027.

The overwhelming majority of Councillors representing Southern wards on the relevant committees must be addressed.

**Officer Response:**

Objections are noted and will weigh in the balance of considerations by Members.

The Woodham and Horsell Neighbourhood Form Issues and Response Topic Paper addresses some of the issues raised in the representation in detail, including how flood risk and traffic impacts have been assessed, and how these assessments will be taken into account. It also addresses the issue of satisfactory infrastructure provision.

McLaren Technologies Group Limited has made a representation with respect to this consultation exercise. Whilst it would generally support in principle the release of the land from the Green Belt, it would only allow its land holding to be used as a strategic employment site to support its own future expansion programme. McLaren will not allow its land to be used

as envisaged in the consultation. If the Council were to decide not to release the land east of Martyrs Lane from the Green Belt, McLaren have provided reasons why its land should be designated as a Major Developed Site in the Green Belt. The representations from McLaren has been addressed in full separately.

It is emphasised that the lack of availability of the site does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the land is the most sustainable when compared with the original six safeguarded sites.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater and Fair Oaks. Under the Duty to Cooperate, the Council is formally and informally consulting with neighbouring boroughs on potential cumulative cross-boundary impacts of development. This would continue if the site were to be safeguarded for development.

Any safeguarded land that will be identified in the adopted Site Allocations DPD will only be released for development as part of the future review of the Core Strategy and/or Site Allocations DPD. Development coming forward of any of the site options would be determined under planning policy of the Development Plan in place at the time. It is likely that this would include a policy on housing mix and tenures. Officers would expect development proposals to contain a mix of housing types which reflect the need of the area, irrespective of whether it is on a single or multiple sites.

The Council has a laid down procedure for selecting Members to serve on Working Groups. This has been followed in selecting the Members of the Local Development Framework Working Group. In this regard, there is no intention of re-constituting the membership of the Group as a result of this particular representation. It is important to emphasise that the decision to consult on the possibility of safeguarding the land east of Martyrs Lane was made by a vote of Full Council and not by the LDF Working Group. As an advisory Group, the Working Group appropriately carried its duties by making recommendations to Council. The Group gave clear and specific reasons for its recommendation. The Council took them into account before coming to its decision to consult on the land east of Martyrs Lane. All Members of the Council will once again have the opportunity to consider the representations to this consultation and decide which overall strategy they wish to publish for Regulation 19 consultation and submit to the Secretary of State for examination.

**Contributor Reference:** 01641/1/001  
**Customer Name:** Mr Ian A White

**Summary of representation:**

The proposal is the best option for Woking.

A previously developed site with outline planning consent, unlike the alternatives.

Would allow the original sites to remain and preserve the nature of the neighbourhoods concerned.

Benefits of economy of scale.

Easier to secure infrastructure such as school, health centre and other facilities – which are already at capacity in West Byfleet and Pyrford.

Least effect on traffic flow due to proximity to A320.

Well situated for local bus transport.

No need to build on the Golf Course.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs

Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect the character of the area surrounding any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the character of the area.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. The Regulation 18 Issues and Matters Topic Paper sets out a detailed response (under paragraph 3) to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 01650/1/001  
**Customer Name:** Mr Malcolm Brown

**Summary of representation:**

Objects to the proposal.

Development of this scale will strain Woking's infrastructure.

Impacts during construction would be intolerable.

Traffic levels would increase on the A320, reducing access to the M25.

Development would spoil the surrounding area – particularly Horsell Common, which is already under threat from McLaren expansion.

Woking has expanded enough. The surrounding countryside is in great danger of being paved over.

**Officer Response:**

Objections are noted.

Some of the issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Matters Topic Paper, including infrastructure capacity and traffic impacts.

The sites' proximity to the Horsell Common Thames Basin Heaths SPA and SSSI is noted. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy. The Core Strategy and Development Management Policies DPD also contain robust policies to ensure that biodiversity and nature assets are protected from any development that will be anticipated to have potentially harmful effects.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail the justification for releasing Green Belt land for future development needs, and describes the methodology adopted by the Council to ensure that the integrity and overall purpose of the Green Belt is protected (see in particular Sections 1 and 2).

The representation regarding impact of development is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities

and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 01676/1/001  
**Customer Name:** Ms Samantha Kassir

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01677/1/001

**Customer Name:** W A Rogers

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01678/1/001

**Customer Name:** Mr Rob Payne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01681/1/001  
**Customer Name:** Ms Mary Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01682/1/001  
**Customer Name:** Ms Hannah Simpson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01683/1/001

**Customer Name:** Ms Kirsten Sharples

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01684/1/001  
**Customer Name:** Ms Geraldine Wilkie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01686/1/001  
**Customer Name:** Ms Janette Rickard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01627/1/001  
**Customer Name:** Ms Rozia Da Silva

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01628/1/001  
**Customer Name:** Mr Donald Fairburn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01617/1/001  
**Customer Name:** Jackie Denney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01618/1/001  
**Customer Name:** Ms Catherine Jeffery

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01619/1/001  
**Customer Name:** Mr Stephen Grabham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01622/1/001  
**Customer Name:** Mr Oliver Kingham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01623/1/001  
**Customer Name:** Mr Geoffrey Allan Laycock

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01624/1/001  
**Customer Name:** Mr Steve Nicholls

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01626/1/001  
**Customer Name:** Mr James Hollingsworth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01658/1/001

**Customer Name:** Ms Janet Neal

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01659/1/001

**Customer Name:** Ms Jo Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01661/1/001

**Customer Name:** Janan Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01662/1/001  
**Customer Name:** Mr Paul Hayes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01663/1/001  
**Customer Name:** Mr Dan Graham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01665/1/001  
**Customer Name:** Ms Eloise Blyth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01666/1/001

**Customer Name:** Mrs G Irish

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01667/1/001  
**Customer Name:** Ms Linda Flory

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01669/1/001

**Customer Name:** Mr Parnham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01670/1/001

**Customer Name:** Mr Ken Nurse

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01671/1/001  
**Customer Name:** Ms Marie Cook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01675/1/001  
**Customer Name:** Mr Peter Wren

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01642/1/001

**Customer Name:** Gilbert

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01643/1/001  
**Customer Name:** Mrs Margaret Gates

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01644/1/001  
**Customer Name:** Mrs B Dunkley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01645/1/001  
**Customer Name:** Ms Linda Bagnall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01647/1/001  
**Customer Name:** Mr Robert Candey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01648/1/001  
**Customer Name:** Mr Noel Richardson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01649/1/001  
**Customer Name:** Ms Mary Pashley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01652/1/001  
**Customer Name:** Ms Charlotte Kingham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01653/1/001  
**Customer Name:** Mr John McGaffney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01654/1/001  
**Customer Name:** Robin Coleman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01656/1/001  
**Customer Name:** Mr And Mrs H Gurney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01657/1/001  
**Customer Name:** Ms Penny Cook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01630/1/001  
**Customer Name:** Mr John Williamson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01631/1/001  
**Customer Name:** Mr Matthew Swinney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01632/1/001  
**Customer Name:** Ms Wendy Morris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01633/1/001  
**Customer Name:** Mr John Bishop

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01634/1/001

**Customer Name:** Mr Ken Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01635/1/001

**Customer Name:** Ms Ann Riley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01636/1/001  
**Customer Name:** Mr Richard Riley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01637/1/001

**Customer Name:** Ms Margaret Bishop

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01638/1/001  
**Customer Name:** Mr Brian William Hart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01673/1/001  
**Customer Name:** Dr Nigel Reeve

**Summary of representation:**

Strongly objects to the proposal.

It will profoundly change the character of the area. A new urban area of this size would greatly extend urban sprawl and change the existing character of the area. The original plan diffuses the proposal future development into smaller parcels across six areas, each more able to absorb its share of the impacts and would not lose their character.

Substantial development planned for this area already: Sheerwater development and Fair Oaks Garden Village. Cumulatively will add strain on the area's infrastructure.

Traffic congestion already very high – would be exacerbated by this scale of development, particularly A320 and A245. These roads already cause noise and pollution which impacts negatively on quality of life. Heavy traffic around roundabouts by the New Zealand golf course and Marist School already. Additional pressure on the road network initially from construction traffic and then from new residents will result in gridlock.

Poor public transport provision in the area. Infrequent bus service, with few routes, and suffers from congestion at peak times. Busy roads discourage cycling. It is a long walk to West Byfleet station or a very congested road journey with expensive parking.

Ecological impacts on the proposed site – there has been no detailed ecological evaluation of the site. It contains important biodiversity, including lowland mixed deciduous woodland, wet woodland, ancient woodland, hedgerow, lowland heath and/or acid grassland. All are UK Priority Habitats. Badger roadkill in the local area testify to their presence on the site. Likely to provide important foraging habitat for bats. The Council has a statutory duty to pay due regard to biodiversity conservation (Section 40 of the Natural Environment and Rural Communities Act 2006 – not confined to designated sites). As well as habitat loss and degradation from the development itself, any major development will bring additional onsite impacts from lighting, pets and disturbance.

Ecological impacts on Horsell Common SSSI and TBH SPA, adjacent to the site. The TBH SPA was specifically retained by the Government in 2013 to protect and safeguard our natural and cultural heritage. Horsell Common is of great biodiversity importance and of immense value to local people. The Common is also under extraordinary pressure, particularly from fouling and disturbance from dogs. Ground nesting birds are particularly under threat. Increased visitor pressure on this site will be detrimental to important wildlife. Even the creation of a SANG is unlikely to meet demand from a development of this size, especially when considered in combination with Fair Oaks and Sheerwater.

## Officer Response:

Objections are noted and will weigh in the balance of considerations by Members.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses several issues raised in the representation in detail, including:

- how landscape and Green Belt assessments commissioned by the Council have assessed the impact on the character of the area and the likelihood of the development leading to urban sprawl;
- the transport impacts of the proposal, and the conclusions of assessments commissioned by the Council, including sustainability of the proposal regarding accessibility to rail stations;
- public transport infrastructure provision, including bus services; and
- the potential adverse impacts on biodiversity present on the site, and how the Council will pay due regard to these assets.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater and proposals at Fair Oaks. Under the Duty to Cooperate, the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has discussed how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross-boundary significance, such as traffic impacts and visitor pressure on the TBH SPA. The neighbouring authorities have made their representations as part of this consultation, which the Council will take into account in forming a decision. The Council will continue to work with neighbouring boroughs on cross-boundary impacts of all safeguarding options.

The sites' proximity to the Horsell Common Thames Basin Heaths SPA and SSSI is noted. The Core Strategy and Development Management Policies DPD contain robust policies to ensure that important wildlife sites and landscape features are protected from development impacts. In particular, policy CS7 on Biodiversity and nature conservation, and CS8 on the Thames Basin Heaths SPA, set out criteria specifying how any adverse impacts must be mitigated in order for development to be supported. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

**Contributor Reference:** 01554/1/001  
**Customer Name:** Mr Harry Chambers

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01555/1/001

**Customer Name:** Cat

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01556/1/001  
**Customer Name:** Mr Richard Condon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01557/1/001  
**Customer Name:** Ms Diane Condon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01558/1/001  
**Customer Name:** Mr Anthony Condon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01559/1/001  
**Customer Name:** Mr Damian Sorgiovanni

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01561/1/001

**Customer Name:** Elizabeth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01563/1/001  
**Customer Name:** Ms Breige Grey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01540/1/001  
**Customer Name:** Mrs Pauline Lewis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01512/1/001  
**Customer Name:** Ms Lucia Laurent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01516/1/001  
**Customer Name:** Mr Wes Austin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01518/1/001  
**Customer Name:** Ms Irene Lindsay

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01534/1/001  
**Customer Name:** Mr Albert Da Silva

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01535/1/001  
**Customer Name:** Ms Amanda Lote

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01538/1/001  
**Customer Name:** Mr Chris Lemon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01522/1/001

**Customer Name:** Ms Jean Aish

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01523/1/001  
**Customer Name:** Ms Nicola Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01524/1/001  
**Customer Name:** Ms Sandra Goldblatt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01525/1/001  
**Customer Name:** Ms Yvonne Pearce

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01526/1/001  
**Customer Name:** Mr Mark Stevens

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01527/1/001

**Customer Name:** A G Ratcliffe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01529/1/001  
**Customer Name:** Ms Lisa Mitchener

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01530/1/001  
**Customer Name:** E D V Ratcliffe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01531/1/001  
**Customer Name:** Ms Maria Porter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01533/1/001  
**Customer Name:** Mr Mark Porter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02646/1/001

**Customer Name:** E H W Elliott

**Summary of representation:**

The Pyrford fields should not be developed upon as it is valuable agricultural land, still being farmed and used for future generations.

**Officer Response:**

Regarding agricultural land classification, as part of the preparation of the Site Allocations DPD process, the Council has undertaken a review of agricultural land quality within the borough. This has included reviewing the Agricultural Land Classification Database as shown on the DEFRA website. This database is produced and maintained by Natural England.

In addition, the Council has consulted with Natural England as part of the Site Allocations DPD process. Natural England has not raised any objections regarding the agricultural quality of any of the sites identified for release from the Green Belt for development needs. Natural England's representation to the Regulation 18 consultation and Land to the east of Martyrs Lane consultation are available to view on the Council's website. The representation also makes reference to the Green Belt boundary review regarding this matter. The report states that for Parcel 9, the agricultural land classification for the land adjacent to the urban areas is classified as 'urban' which is consistent with the Regional Agricultural Land Classification Maps produced by Natural England.

None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

**Contributor Reference:** 01549/1/001

**Customer Name:** M Y Foat

**Summary of representation:**

Mr K Foat has drawn the attention of the Council to Woodham Court site in previous years, which, despite being washed over by the Green Belt, has 'brownfield' characteristics as it is a previously used site with existing footprints. It makes little contribution towards Green Belt status.

Correspondence from the Council during the Core Strategy preparation indicated that the site was not suitable for development during that period. Would rather the site was not developed as part of a larger scheme including adjacent McLaren land and New Zealand Golf Course land: preference is for independent development before 2027. The site possesses special circumstances. A sustainable development on what is essentially brownfield land would pose no threat to the Green Belt and could contribute to the regeneration of a derelict area, and provide employment opportunities etc.

**Officer Response:**

The in-principle support for development of the site at this Green Belt location is noted. At Core Strategy stage, the support for development of the site from Mr K Foat was considered, but the purpose of the Core Strategy was to set out the broad locations where development would be accommodated, rather than allocating specific sites for development. This would be the purpose of the Site Allocations DPD.

Land at Woodham Court was subsequently appraised as part of the Site Allocations DPD preparation process for mixed-use development. However, it was not recommended for allocation as it did not conform with the evidence base: the Green Belt boundary review concluded that the parcel within which the site is located had low suitability for removal from the Green Belt (see paragraphs 3.5.5 and 3.5.11 of the report by Peter Brett); and development of the site alone would result in an isolated satellite development within the Green Belt, unconnected to the urban area, and therefore not accord with the NPPF or Core Strategy planning policy.

A second landscape assessment conducted by Hankinson Duckett Associates (2016) recognises the site's capacity for development as the area of recreation does not possess many of the features that are characteristic of the landscape area, so its loss to development would have no adverse effects on the wider landscape. However, the report does agree that development at this site alone would leave an area of development unconnected to the urban area (see paragraph 3.3.11 of the report). The report concludes that Parcel A, within which this site is located, plays an important role in checking the sprawl of Woodham and the villages to the north of Woking. Potential development here alone would be very isolated from any built-up area, and therefore the parcel is of critical important in Green Belt function.

The proposed modification is noted (i.e. bringing the site forward for development before 2027). The Council has identified sufficient sites – which perform well in appraisals conducted as part of the evidence base for the Site Allocations DPD – up until 2027. Sections 1 and 2 of the Regulation 18 Issues and Matters Topic Paper describe the methodology used in detail. It is not therefore necessary to allocate the site for development before 2027, as alternative sites are considered to be more sustainable.

**Contributor Reference:** 01595/2/001  
**Customer Name:** Ms Lorna Forsyth

**Summary of representation:**

Objects to proposal. Preference is to spread development over multiple sites and areas, to disperse the population. Directing new housing to one relatively small site will overburden surrounding roads and facilities e.g. GP's. It would be unsustainable. Also objects because it would be on Green Belt land.

**Officer Response:**

Objection to the Martyrs Lane proposal and support for a dispersed approach is noted.

The issues set out in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 01605/1/001  
**Customer Name:** Mr Michael Hipkins

**Summary of representation:**

It is more in keeping with the character of the Borough to use the six previously designated safeguarded smaller sites spread across the Borough. This is particularly the case in view of the proposed development at Fair Oaks Airport as a garden village, which would abut the Martyrs Lane development.

**Officer Response:**

The spatial strategy of the Core Strategy seeks to focus most new development in the main centres which have a range of services and facilities to minimise the need to travel. The Site Allocations DPD reflects this strategy. It is also agreed via the Core Strategy that Green Belt land will be released to meet future development needs between 2022 and 2040.

There are various merits associated with both distributing development across the Borough, and with directing development to a single, large site to meet development needs. If issues such as infrastructure capacity, traffic, Fair Oaks development and landscape impacts of developing one large site are of concern, these issues are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. Section 1 of this paper also sets out Officers' views about the potential for urban sprawl.

**Contributor Reference:** 01606/1/001  
**Customer Name:** Mr David Aldous

**Summary of representation:**

Supports the proposal, particularly for the Mayford sites to be replaced as these are bound by narrow railway bridges, tunnels and an ancient humped-back bridge, making them unsustainable for development. The local facilities – doctors, dentists and shops are at capacity with present demand of residents. Extra facilities would be needed.

Development at Martyrs Lane will be supported by appropriate new infrastructure and has access to good road connections, without limitations of narrow carriageways.

Travellers could also be accommodated at Martyrs Lane, giving easier access for their mobile dwellings and access to main roads.

**Officer Response:**

Support is noted.

The representation against development in Mayford have been addressed by the Council in the Regulation 18 Issues and Matters Topic Paper, in particular infrastructure provision and transport implications.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. However, the minor roads around Mayford have not been identified as ones expected to suffer from exacerbated congestion. The studies do confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary.

At Regulation 18 stage, officers had recommended to Council that need for Traveller accommodation should be met at Five Acres and Ten Acres. That need is 19 pitches up to 2027. At the Council meeting, Members requested that officers revisit this recommendation and report to them before making a decision about their strategy for Regulation 19 consultation. Officers accordingly are investigating this matter and will be reporting to Council in due course.

**Contributor Reference:** 01607/1/001  
**Customer Name:** Mr John Cockrill

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, and the necessary social and community infrastructure needed to support it, without encroaching on the golf course. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

Local roads around Hook Hill Lane are unsuitable for increased traffic load – they are already being used as rat runs, creating a danger to walkers and local residents.

Rural views and surroundings afforded by Hook Heath escarpment would disappear if the land was developed. The property would be surrounded on all four boundaries by houses. Concerned about sight lines into the garden and house, and reduced quality of life during construction time. There would be a significant reduction in the property value.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads – such as those around Hook Hill Lane – for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs

Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

Officers recognise that there may be an impact on the amenity of local residents during the construction of housing, but planning conditions attached to any approved planning permission would seek to limit this impact. Concern over reduced privacy and depreciation in property value is understandable. There are robust policies in the Core Strategy and Development Management Policies DPD to ensure that any development coming forward is of the highest design quality, supported by green infrastructure, and that the amenity of nearby residents is protected. These policies would be applied at the Development Management stage.

**Contributor Reference:** 01608/1/001  
**Customer Name:** Ms Janet Cockrill

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, and the necessary social and community infrastructure needed to support it, without encroaching on the golf course. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

Local roads around Hook Hill Lane are unsuitable for increased traffic load – they are already being used as rat runs, creating a danger to walkers and local residents.

Rural views and surroundings afforded by Hook Heath escarpment would disappear if the land was developed. The property would be surrounded on all four boundaries by houses. Concerned about sight lines into the garden and house, and reduced quality of life during construction time. There would be a significant reduction in the property value.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads – such as those around Hook Hill Lane – for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs

Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

Officers recognise that there may be an impact on the amenity of local residents during the construction of housing, but planning conditions attached to any approved planning permission would seek to limit this impact. Concern over reduced privacy and depreciation in property value is understandable. There are robust policies in the Core Strategy and Development Management Policies DPD to ensure that any development coming forward is of the highest design quality, supported by green infrastructure, and that the amenity of nearby residents is protected. These policies would be applied at the Development Management stage.

**Contributor Reference:** 01625/1/001  
**Customer Name:** Mr Herbert C Abela

**Summary of representation:**

Agrees with the proposal.

**Officer Response:**

Support noted

**Contributor Reference:** 01536/1/001  
**Customer Name:** Ms Lynn Cozens

### **Summary of representation:**

Objects to proposals to build on the Green Belt in Woking; but if any Green Belt development is absolutely essential and completely unavoidable then Martyrs Lane is more appropriate than the original six sites that were proposed.

The Green Belt is a vital part of the environment and highly valued by residents. Majority of residents do not support building on the Green Belt and strongly disagree with the Council's approach. The Conservative Council should respect the Conservative Government which emphasises the protection of the Green Belt from development.

The Council should prioritise development on previously developed land. A full and proper review of brownfield/empty and underused buildings has not been carried out. This should happen before commissioning consultants to review the Green Belt. The Council seems to be directing most of its efforts to selecting Green Belt sites. Any Green Belt review should only take place once all brownfield land is exhausted and no empty properties remain.

The Council should not be attempting long term housing need forecasts due to the uncertainty of future housing needs, the economy and fluctuating immigration levels. Even short term projections could prove inaccurate. Only a ten-year plan is needed, with a five-year rolling supply. Longer term projects should be paused until the effects of Brexit are more certain. Site allocations beyond 2027 are not appropriate and unnecessary.

Proposals are stating numbers far in excess of 550 houses that is stated need to be on Green Belt land. West Hall alone has this capacity. There should be no need for Green Belt land if other areas are properly addressed.

Concerned about the process leading to permission to release a degree of Green Belt land. Was unaware of previous consultations regarding this, including any publicity about it. Explain which processes took place and how. This needs impartial and independent scrutiny.

The original Byfleet sites are inappropriate because:

1. In previous reviews Byfleet has been identified as inappropriate for any further major development;
2. Flooding issues, expounded by the only means of exit being via Parvis Road, which is congested and close to maximum permitted pollution levels;
3. Limited size and capacity for housing given the constraints from the floodplain and water;
4. The sites border floodplains, and the vegetation therefore plays a vital role in reducing groundwater levels – removal of trees will increase pressure on the floodplains. Environment Agency has identified the Sanway area of Byfleet as at very high risk of flooding.
5. The availability of land (as the landowner is willing to sell) has been prioritised over and above the sustainability of the land;

6. The Byfleet Petition should be given more weight given the size of the response;
7. Together with West Byfleet and Pyrford sites, there is an overconcentration of development in this area (putting pressure on local infrastructure such as roads, schools and GPs) and loss of Green Belt in one general region.

Concern about lack of infrastructure and funding of infrastructure to support the level of housing required.

Broadoaks in West Byfleet as a previously developed site is a reasonable location for some level of development. If all brownfield sites and empty buildings are exhausted, and all the above points have been fully addressed, Martyrs Lane is more suitable than original six sites. However, the level of development should be minimised and maximum green space retained. There are also open spaces in the surrounding areas, whereas this is not really the case with the original sites. Martyrs Lane allows access and exit on to different areas rather than concentrating traffic on just one road. Traffic issues may be mitigated by greater access to the north and south of the site, and avoid all traffic being concentrated onto one small area, unlike the original sites. Martyrs Lane does not have flood issues.

Strongly objects to large-scale development in Byfleet or loss of Byfleet green spaces.

**Officer Response:**

The objections to development on Green Belt land are noted; as is support for the proposal to substitute the six original sites with one site at Martyrs Lane if unavoidable.

The Council agrees that the Green Belt is a vital part of Woking's environment and is highly valued by residents. In response to the Regulation 18 consultation on the draft Site Allocations DPD, the Council prepared an Issues and Matters Topic Paper (available on the Council's website) which addresses many of the issues raised in the representation in detail, including:

- the justification around releasing Green Belt land to meet future development needs of Woking beyond 2027 (i.e. over and above the 550 new homes required between 2022-2027), and how the approach was reached in line with the National Planning Policy Framework issued by the Government, and in line with the Government's commitment to housing delivery (Sections 1 and 2);
- why it is necessary to safeguard sites for development beyond 2027 (Section 2);
- how the Council has conducted a full review of brownfield sites, including empty buildings, in advance of identifying Green Belt sites (Sections 1, 11 and 16) and how all reasonable alternatives have been considered (Section 9);
- how the decision was reached to permit the release of Green Belt land by the independent and impartial Core Strategy Examination Inspector (paragraph 1.6-1.12).

The Inspector recommended the release of Green Belt land for housing development at the Core Strategy Examination. The Core Strategy was prepared over a number of years, and went through various stages of production, including several rounds of consultation on the draft document (in 2009, 2010, and 2011) and an Examination in Public took place over five days in

March and April 2012. The Council was concerned to ensure that public involvement was central to the Core Strategy preparation process, and took into account comments received at each consultation stage. The Inspector concluded that the Core Strategy had been prepared in accordance with Woking's Statement of Community Involvement, and all relevant regulations dictating consultation requirements.

The issues concerning the specific Byfleet sites have been addressed as part of the Regulation 18 consultation process, and further details can be found in the Issues and Matters Topic Paper, particularly:

- Section 5 setting out how flood risk has been assessed;
- Section 13 on how the ownership status of land has no bearing on whether it is released from the Green Belt;
- Section L on how the allocation of sites for development is not evenly spread across the Borough;
- Sections 3 and M on how existing infrastructure has been assessed;
- Section T on how the Byfleet petition has been taken into account.
- Section 3, 20, V and U on how the developments will impact on local transport networks.

Land at Broadoaks, Parvis Road, was allocated for development in the draft Site Allocations DPD and this remains the case. This is not one of the sites being consulted on in this particular exercise. The merits of the Martyrs Lane site as set out in the representation are noted and will weigh in the balance of considerations by Members.

**Contributor Reference:** 01604/1/001  
**Customer Name:** Ms Liz Wilcockson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01609/1/001  
**Customer Name:** Mr David Melham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01611/1/001  
**Customer Name:** Mr Christopher Stanley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01612/1/001  
**Customer Name:** Ms Pat Stanley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01613/1/001  
**Customer Name:** Ms Estelle Hewett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01614/1/001

**Customer Name:** Ms Anne Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01616/1/001  
**Customer Name:** Mr Mark Goodship

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01539/1/001  
**Customer Name:** Ms Natasha Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01589/2/001  
**Customer Name:** Ms Julie Barlow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01590/1/001  
**Customer Name:** Mr Peter Cooper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01591/1/001  
**Customer Name:** Ms Valerie Cooper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01593/1/001  
**Customer Name:** Ms Emma Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01594/1/001  
**Customer Name:** Mr Graham Newell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01595/1/001  
**Customer Name:** Ms Lorna Forsyth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01596/1/001  
**Customer Name:** Mr Daryl Jordan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01597/1/001  
**Customer Name:** Mr Dean Brook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01598/1/001

**Customer Name:** Ms Rubina Davidian

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01599/1/001  
**Customer Name:** Mr Gordon Johnston

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01564/1/001  
**Customer Name:** Mr Grainne Gormley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01565/1/001  
**Customer Name:** Mr Vic Hitching

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01566/1/001  
**Customer Name:** Mr John Riddick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01567/1/001  
**Customer Name:** Ms Julia Bailey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01568/1/001  
**Customer Name:** Ms Ilsa Bellion

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01569/1/001  
**Customer Name:** Mr Darren Ruane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01570/1/001

**Customer Name:** Mr A Newell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01571/1/001  
**Customer Name:** Ms Mary Sinnott

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01572/1/001  
**Customer Name:** Mr Clive Plant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01573/1/001  
**Customer Name:** Ms Joanne Whelan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01574/1/001  
**Customer Name:** Ms Isabelle Todd

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01576/1/001  
**Customer Name:** Mr Jaymie Andrew

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01577/1/001  
**Customer Name:** Ms Joanne Mallett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01578/1/001  
**Customer Name:** H A Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01580/1/001  
**Customer Name:** Mr Nick Housley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01581/1/001  
**Customer Name:** Ms Jan Tuck Martin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01584/1/001

**Customer Name:** Ms Bronwen Cousins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01585/1/001  
**Customer Name:** Ms Joyce Singh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01586/1/001

**Customer Name:** Mr Sunette Vanaarde

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01587/1/001  
**Customer Name:** Mr Keith Schneider

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01588/1/001  
**Customer Name:** Ms Diana Olmos

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00215/2/001  
**Customer Name:** Mr Ronald Woollcott

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01589/1/001  
**Customer Name:** Ms Julie Barlow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01601/1/001  
**Customer Name:** Mrs S Hopkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01602/1/001  
**Customer Name:** Ms Julia Goodsir

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01603/1/001  
**Customer Name:** Mr Mark Goodsir

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01519/1/001  
**Customer Name:** Mr Richard King

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01521/1/001  
**Customer Name:** Mr Terry Lodge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01542/1/001  
**Customer Name:** Ms Katharine Bradley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01543/1/001

**Customer Name:** Mr Steven Lightman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01544/1/001  
**Customer Name:** Mr Adam Harding

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01545/1/001  
**Customer Name:** Ms Janet Moore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01546/1/001  
**Customer Name:** Ms Lynda Sage

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01547/1/001  
**Customer Name:** Ms C S Nicholas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01550/1/001  
**Customer Name:** Ms Rebecca Sim

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01551/1/001  
**Customer Name:** Ms Marnie Chambers

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01552/1/001  
**Customer Name:** Mr Ray Glaister

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01582/1/001  
**Customer Name:** Ms Ruth Frewin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01583/1/001  
**Customer Name:** Ms Maria Hamilton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01615/1/001  
**Customer Name:** Ms Lauren Low

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01620/1/001

**Customer Name:** D Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01621/1/001  
**Customer Name:** Ms Rose Dams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01629/1/001  
**Customer Name:** Mr Robert Brookes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01639/1/001  
**Customer Name:** Ms Georgia Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01646/1/001

**Customer Name:** Sarah

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01651/1/001  
**Customer Name:** Ms Debbie Eke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01655/1/001  
**Customer Name:** Mr Colin Rogers

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01660/1/001  
**Customer Name:** Ms Sylke Ryan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01664/1/001  
**Customer Name:** Gajan Sritharan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01668/1/001  
**Customer Name:** Ms Julie Rudland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01672/1/001  
**Customer Name:** Mr John Rudland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01674/1/001

**Customer Name:** D A Carlsson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01680/1/001  
**Customer Name:** Ms Brenda Rouse

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01687/1/001  
**Customer Name:** Ms Chrissie Lomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01688/1/001  
**Customer Name:** Mr Christopher Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01689/1/001  
**Customer Name:** Ms Jill Macmillen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01690/1/001

**Customer Name:** Gill Snow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01693/1/001  
**Customer Name:** Ms Daphne Price

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01694/1/001  
**Customer Name:** Mr Dave Gregory

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01695/1/001  
**Customer Name:** Mr Ian Chevalier

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01493/1/001  
**Customer Name:** Ms Kelly Stanford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01494/1/001

**Customer Name:** Diana

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01495/1/001  
**Customer Name:** Seema Richardson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01496/1/001  
**Customer Name:** Mr Josh Hayes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01497/1/001  
**Customer Name:** Ms Barbara Blake

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01685/1/001  
**Customer Name:** Highways England

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 01513/2/001  
**Customer Name:** Ms Claire Simpson

**Summary of representation:**

The land to the east of Martyrs Lane is situated within Green Belt which has been demonstrated to be providing its purpose of preventing the joining up of neighbouring towns/villages. There is a presumption against development in the Green Belt unless Very Special Circumstances can be demonstrated which is clearly set out within the National Planning Policy Framework 2012. That has not happened here – only a wish to avoid opposition in other areas of the Borough where the identified sites are not in areas of strongly performing Green Belt.

Appreciates the difficulties that WBC, in conjunction with other local authorities, has in finding the necessary land to meet its housing allocation, however this area is fundamentally not suitable for the number of dwellings proposed. The local infrastructure struggles as it is when either the A320 Chertsey Road or Woodham Lane have roadworks.

Furthermore there would no longer be a separation between Woodham and Woking which this area of Green Belt clearly provides. It would be far better to proceed with the safeguarded sites in Byfleet, Mayford and Pyrford where the impact is not as great.

**Officer Response:**

The representation regarding urban sprawl and the merging of settlements and transport infrastructure has been addressed by the Council in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

It should also be noted that the land to the east of Martyrs Lane consultation was not for 3000 houses as suggested in the representation. As set out in the consultation paper, the Council considers that the site could accommodate at least 1200 net additional homes. This is based on the broad capacity of the six original sites identified in the draft Site Allocations DPD.

**Contributor Reference:** 01691/1/001  
**Customer Name:** Ms Louise Sinclair

**Summary of representation:**

The Green Belt is an important feature of the area and the trees and green spaces should be retained.

The road infrastructure is at capacity and development would make the situation worse.

**Officer Response:**

The representation regarding road infrastructure has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The contribution that the Green Belt in this location makes to the overall purposes of Green Belt has also been addressed in the Topic Paper.

The Council has a number of policies in place to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths SPA, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy as well as DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and the Woodland Trust have all been consulted and their representations will be taken into account to inform the Council's preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

**Contributor Reference:** 01692/1/001  
**Customer Name:** Mr And Mrs Bob And Gill Giddings

**Summary of representation:**

Pleased that Councillors from across the borough have agreed to consult residents further about the proposed site.

The site is a better solution to Woking's future housing and traveller needs than Mayford and the other sites. It is large enough for over 1000 houses, including affordable housing and appropriate infrastructure. It would also have the advantage of being one housing estate rather than a number of smaller dispersed ones.

The Martyrs Lane site would meet future housing needs without building on the Green Belt at all. There may also be the scope to meet any additional Central Government housing requirements.

**Officer Response:**

Support for the Martyrs Lane site is noted.

Whilst the site is around 112ha in size, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' accordingly are investigating this matter and will be reporting to Council in due course.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 01718/1/001  
**Customer Name:** Ms Eleanor Graves

**Summary of representation:**

Objects to the proposed safeguarding of land in Pyrford.

The NPPF states that brownfield land should be used before Green Belt. If exceptional circumstances exist then this should apply to the Martyrs Lane site.

The Green Belt in Pyrford has been farmed for centuries and undeveloped. It is an important landscape feature in the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The Martyrs Lane site by contrast has no current use at all.

Planning permission has been granted for a factory in the northern section of the site, which has been revoked on request of the applicant. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. The land also includes a former army camp and landfill site. The site to the north is semi-derelict, unused, uncared for and overgrown woodland. It is pre-developed land in the Green Belt. The sites should have been initially prioritised by WBC.

There has been confusion regarding the number of dwellings required to be safeguarded. The Pyrford Neighbourhood Forum maintains that 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

## Officer Response:

Objection to proposed safeguarding of land in Pyrford is noted.

As addressed in the Council's Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has been established and is consistent with national policy. Therefore the focus of the land to the east of Martyrs Lane consultation should be about ensuring that the proposed allocations put forward by the Council in the Regulation 19 version of the Site Allocations DPD are the most sustainable when compared against other reasonable alternatives.

The representations relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close

proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and

- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be

relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding point 10 of the representation the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Whilst the merits of the Martyrs Lane site have been noted, it would be incorrect to state that the site is not used for recreational activities as it contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. As part of the consultation, the Council has consulted with Sport England and their comments will be addressed separately and will be used to inform the Council's decision on its preferred safeguarding strategy.

**Contributor Reference:** 01610/1/001  
**Customer Name:** Bell Cornwell

**Summary of representation:**

The draft Site Allocations DPD has been prepared following analysis of and response to the comments received in relation to the Regulation 18 consultation. The land east of Martyrs Lane is a new site that has not previously been consulted upon and does not currently form part of the draft Site Allocations DPD.

The 2017 consultation is focused solely on this one matter and so the contents of the draft Site Allocations DPD in all other respects is to remain unchanged subject to consideration by Full Council.

Would like to acknowledge that the draft Site Allocations DPD Regulation 19 Document, which is in the public domain, has confirmed that Broadoaks, Parvis Road, West Byfleet (GB6) is identified within Policy SA1 of the draft Site Allocations DPD as one of the sites for immediate release from the Green Belt for development. SA1 identifies that the site is released from the Green Belt and allocated for a mixed use development to include quality offices and research premises, residential including Affordable Housing and educational facilities (Secondary school). It is set out that development of the site can come forward within the Plan period (between 2016 and 2027). It is also of note that the Plan acknowledges the planning resolution on the site and its mix of uses.

Support the Council's draft Site Allocations Document and its intention to remove site GB6 from the Green Belt to facilitate its development within the plan period. If the immediate release sites are not recognised as available, then the discussion of safeguarded sites meeting housing need cannot have a firm base to proceed from. No comments to make in relation to the appropriateness or deliverability of the alternative site on land east of Martyrs Lane.

**Officer Response:**

The Council is fully aware of the previous stages of the Site Allocations DPD and the background to the land to the east of Martyrs Lane consultation.

Comments relating to Broadoaks are noted. This will be considered by the Council when it decides on its preferred safeguarding strategy.

**Contributor Reference:** 01696/1/001  
**Customer Name:** Mrs Mandy I Keane

### **Summary of representation:**

The NPPF states that brownfield land should be used before Green Belt, if exceptional circumstances exist.

The Green Belt in Pyrford has been farmed for centuries and undeveloped. It is an important landscape feature in the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The Martyrs Lane site by contrast has no current use at all.

Planning permission has been granted for a factory in the northern section of the site, which has been revoked on request of the applicant. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. The land also includes a former army camp and landfill site. The site to the north is semi-derelict, unused, uncared for and overgrown woodland. It is pre-developed land in the Green Belt. The sites should have been initially prioritised by WBC.

There has been confusion regarding the number of dwellings required to be safeguarded. The Pyrford Neighbourhood Forum maintains that 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents

would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

#### **Officer Response:**

As addressed in the Council's Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has been established and is consistent with national

policy. Therefore the focus of the land to the east of Martyrs Lane consultation should be about ensuring that the proposed allocations put forward by the Council in the Regulation 19 version of the Site Allocations DPD are the most sustainable when compared against other reasonable alternatives.

The representations relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be

available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded,

the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding point 10 of the representation the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Whilst the merits of the Martyrs Lane site have been noted, it would be incorrect to state that the site is not used for recreational activities as it contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. As part of the consultation, the Council has consulted with Sport England and their comments will be addressed separately and will be used to inform the Council's decision on its preferred safeguarding strategy.

**Contributor Reference:** 01712/1/001

**Customer Name:** Byfleet, West Byfleet And Pyrford Resident Association

**Summary of representation:**

Support for the Martyrs Lane site for housing as it is more appropriate than those in Pyrford, Byfleet and West Byfleet. The land should have been included in the original consultation.

The New Zealand Golf Course was included in the site area for process/technical reasons, leading to the Woodham action group stating that 5000 homes would be built when less than 1000 are intended.

Most of the objections to the Martyrs Lane site are based on misinformation and therefore invalid, a situation that was in part created by Woking Borough Council.

Landowners of the site appear to have much less active in lobbying to Woking Borough Council than private landowners or agents. Part of the land is in public ownership and there should be a preference for this land to be allocated despite it not being a planning consideration.

The matter of infrastructure, highways, services, health and education are no less of an issue in Byfleet, West Byfleet and Pyrford and this is not a planning matter. It is possible to say they are less of a problem than in Byfleet and Pyrford.

Objectors refer to Woodham Village which is misleading. Woking Borough Council has made no effort to correct this misconception. It is the McLaren Village the Ottershaw side of Woking, not Woodham as Woking Borough Council have allowed it to be described. Therefore these objections should be considered carefully as not being objective.

**Officer Response:**

Support for the Martyrs Lane site is noted.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension

revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

The consultation document is very clear in stating that 'it is anticipated that the site is sufficient to enable the delivery of at least 1200 net additional homes and the necessary green and other infrastructure to support the potential development of the site'. Therefore it is incorrect that the scope of the consultation is for less than 1000 net additional dwellings.

The consultation on land to the east of Martyrs Lane is set out in detail in the Consultation Paper, dated January 2017. The proposal for consultation is very clear that the whole 112.1ha site has been identified for consultation, in respect of the possibility of substituting it for the sites safeguarded in the draft Regulation 18 version of the Site Allocations DPD to meet the long term development needs of the Borough between 2027 and 2040. To clarify, the Council has consulted on whether to safeguard the entire site for future development needs. At no point in the consultation document does it state that the New Zealand Golf Course will not be developed if the site is safeguarded by the Council. This is a matter that the Council will only consider in detail if it decides that this site is its preferred safeguarding option.

Regarding land availability, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The availability of land is a significant consideration in the plan making process and representations received from all landowners will be considered by the Council.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

There is no ambiguity within the consultation document. The Council has consulted exactly on what it intended to seek views on, which is to test the possibility of substituting the land to the east of Martyrs Lane for the six sites originally identified for safeguarding in the draft Site Allocations DPD. The matters raised within all representations received by the Council will be fully considered by Members and will be used to inform the Council's preferred safeguarding approach.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Whilst some of the land within the site is publicly owned land, this makes up less than 1% of the total site area and therefore does not make up a significant proportion of the site. Land in public ownership includes the Martyrs Lane Recycling Centre and grass verges.

Again as highlighted above, the Council has consulted on 'the land to the east of Martyrs Lane', which is a factual description of the location of the site. Regardless of the description or name of the site used within representation received as part of the consultation, the Council will carefully consider the substance of each representation to inform its decision on the matter.

**Contributor Reference:** 01713/1/001

**Customer Name:** Ms Eva Faraji

**Summary of representation:**

Objects to the proposed safeguarding of Martyrs Lane for future development needs.

The road network is at capacity and congested.

There are not enough school places for children and expanding the existing schools is not an option. The only solution to education provision is to build new schools as well as dwellings. High classroom pupil numbers will result in worse results and it is important to educate well future generations.

**Officer Response:**

Objection noted.

The representation regarding traffic and congestion and education provision has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 01724/1/001

**Customer Name:** K Blake

**Summary of representation:**

Please preserve the Green Belt in Byfleet.

With land already released for development in West Byfleet at Broadoaks and West hall, this already meets the housing need for 550 new dwellings.

This will add to congestion on local roads and additional development in Byfleet will make the situation worse.

Green Belt in Byfleet is mainly flood plain and development will increase flood risk.

Use brownfield sites that are currently abandoned.

Byfleet will no longer be a village.

**Officer Response:**

The purpose of the Martyrs Lane consultation is to inform the Council's approach to safeguarding land for future development needs. Whilst Broadoaks and West Hall may be allocated by the Council in the Site Allocations DPD, they are at this stage intended to be released from the Green Belt before 2027. The Martyrs Lane site along with the sites in Byfleet, Pyrford and Mayford are to be safeguarded for future development needs between 2027 and 2040. The Council's decision to safeguard land up to 2040 is considered to be consistent with national planning policy.

The Council has addressed the representation on flooding and traffic in the Regulation 18 consultation Issues and Matters Topic Paper. The Council has also addressed the representation on brownfield land and the impact on local character within the same document.

**Contributor Reference:** 01697/1/001  
**Customer Name:** Mr Ron Cowan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01698/1/001  
**Customer Name:** Sharon Cowan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01699/1/001

**Customer Name:** Mr Ian Adam

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01700/1/001

**Customer Name:** Jean Wallman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01702/1/001  
**Customer Name:** Ms Anne Lewis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01703/1/001

**Customer Name:** C Brooke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01704/1/001  
**Customer Name:** Ms Clare Webber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01711/1/001  
**Customer Name:** Mr Peter Claridge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01714/1/001  
**Customer Name:** Ms Pauline Dawson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01715/1/001  
**Customer Name:** Mr Gary Dawson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01716/1/001  
**Customer Name:** Mr Steve Battams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01717/1/001  
**Customer Name:** Quentin Jordan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01719/1/001  
**Customer Name:** Ms Teresa Stembridge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01720/1/001  
**Customer Name:** Warren Stembridge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01721/1/001  
**Customer Name:** Mr Douglas Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01722/1/001  
**Customer Name:** Mr Chris Twilley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01723/1/001  
**Customer Name:** Ms Hannah Pollard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01726/1/001  
**Customer Name:** Mr Steve Hughes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01727/1/001  
**Customer Name:** Mr Chris Watmore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01728/1/001

**Customer Name:** Chris Carlin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02934/1/001  
**Customer Name:** Ms Helen Butt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01730/1/001  
**Customer Name:** Matthew Barac

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01498/1/001  
**Customer Name:** Ms April Hopkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01499/1/001  
**Customer Name:** Ms Emma Soutar

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01500/1/001  
**Customer Name:** Mr Colin Mabe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01501/1/001  
**Customer Name:** Mr Mike Sacchi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01502/1/001  
**Customer Name:** Mrs Helen Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01503/1/001  
**Customer Name:** Mr Christopher Browne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01504/1/001  
**Customer Name:** Ms Susan Heap

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01505/1/001  
**Customer Name:** Mrs Penelope Hughes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01506/1/001  
**Customer Name:** Mr Paul Green

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01507/1/001

**Customer Name:** Alex Stopps

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01508/1/001  
**Customer Name:** Ms Mary Guyatt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01509/1/001

**Customer Name:** Marcia Butler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01511/1/001  
**Customer Name:** Ms Carole Croft

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01515/1/001  
**Customer Name:** Ms Annette Steele

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01517/1/001  
**Customer Name:** Mr Malcolm Gambold

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01520/1/001  
**Customer Name:** Mary Gambold

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01528/1/001  
**Customer Name:** Charlie Yianoullou

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01532/1/001  
**Customer Name:** Ms Gemma Tickner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01537/1/001  
**Customer Name:** Mr James Bishop

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01541/1/001

**Customer Name:** Ms Jennifer Turner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01548/1/001

**Customer Name:** Ms Catherine Garrett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01553/1/001  
**Customer Name:** Nellie Ngwena

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01560/1/001  
**Customer Name:** Ms Elizabeth Egginton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01562/1/001  
**Customer Name:** Mr John Young

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01575/1/001  
**Customer Name:** Mr Jonathan Cheney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01579/1/001  
**Customer Name:** Ms Jennifer O'Sullivan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01705/1/001

**Customer Name:** Mr John Lord

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01706/1/001  
**Customer Name:** Ms Rachel Eddershaw

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01707/1/001  
**Customer Name:** Mr Stan Peploe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01708/1/001  
**Customer Name:** Mr Simon Hayes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01709/1/001  
**Customer Name:** Mr Simon Hobbs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01710/1/001  
**Customer Name:** Mr John Athersuch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01433/1/001

**Customer Name:** Silvino Leal

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01434/1/001  
**Customer Name:** Mr Nicholas Stunt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01435/1/001  
**Customer Name:** Mr Jack Valentine

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01436/1/001  
**Customer Name:** Mr Stuart Mannering

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01437/1/001  
**Customer Name:** Mr John Eastwood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01438/1/001

**Customer Name:** Ms Dee Patel

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01439/1/001

**Customer Name:** Ms Michaela Benham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01440/1/001  
**Customer Name:** Ms Catherine Teague

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01442/1/001

**Customer Name:** Ms Julie Nash

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01445/1/001

**Customer Name:** Alka Kirby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01446/1/001

**Customer Name:** Jagruti Adhiya

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01447/1/001  
**Customer Name:** Ms Kelly Holmes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02673/1/001

**Customer Name:** Mrs J Markey

**Summary of representation:**

There is no point expressing our views. Plans will go ahead to matter what is said.

This beautiful area is being systematically destroyed, becoming an extension of the town centre. The character charm of the three 'villages' which makes it unique from concrete buildings, office blocks and car parks will be lost.

Roads will be overstretched. Parvis Road development suggests little thought has been given to motorists.

Walking is not a healthy option given the pollution from traffic fumes. There is mayhem at The Marist School at drop-off time, causing further congestion.

We all know Woodham is a done deal. It'll be one continual car park down to the six cross roads.

Local road and pavement issues are being ignored. No doubt funds will be found to fund repairs to the destruction new developments will incur.

Expects the Old Woking Road will be ripped up again as it always is to accommodate more works required towards further development in this area, thus destroying this once stunning place to live.

**Officer Response:**

The Council takes all the representations it receives into account in the preparation of its Development Plan Documents. The views of local residents are not ignored. However, it has to balance those views with its responsibility to plan to meet the development needs of the Borough, and accommodate a growing population.

The Core Strategy identifies the broad location for new homes, jobs, community facilities and services and how they will be deliver. In doing so, a key objective is to preserve and enhance the cultural, historic, biodiversity and geodiversity features of the Borough, and to protect the integrity of the Green Belt. The Regulation 18 consultation Issues and Matters Topic Paper sets out a detailed justification for the release of Green Belt land to meet the development needs of the Borough (see Sections 1 and 2).

Whilst the Council sympathises with concerns of residents about the impacts that the release of Green Belt land will have on local character, it has ensured through a number of studies can any land that is released from the Green Belt will not undermine its overall purpose and integrity. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

As per national planning policy (NPPF), when safeguarding land the Council must identify areas between the urban area and the Green Belt. Therefore the proposed sites could be regarded as extensions of Woking's Urban Area (rather than the Town Centre) as cited in the representation. However, the Green Belt boundary review recommends sites based on their contribution towards the above purposes, and those which contribute the least were originally selected in the draft Site Allocations DPD, thus avoiding the merging of towns and unrestricted urban sprawl.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The proposed sites do, therefore, need to be in close proximity to the urban area in order to be considered sustainable. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors. Other sections of this Issues and Matters paper address some of these other factors in detail.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage and landscape features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage or landscape assets of the area. Section 23 of the Regulation 18 consultation Issues and Matters Topic Paper addresses this issue in more detail.

According to the Air Quality Report published by the Council, there is only one area in Knaphill that has been declared an Air Quality Management Area. However, the Council recognises it has a responsibility to measure and improve air quality and any development needs to be sensitive to air quality. New houses and more cars in an already high air pollution area would increase levels of NO<sub>2</sub> whereas spreading the development over six sites would be far less damaging.

The Council accepts that car ownership and usage is relatively high in Woking compared with the national average. However, the overall spatial strategy of the Core Strategy is to concentrate most new development at the main centres because they offer a range of key

services and facilities to help minimise the need to travel and to encourage sustainable travel modes. Specific references are made to Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. These policies have been scrutinised at Examination and judged to be in conformity with the NPPF. In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality. Policy CS18 of the Core Strategy makes this point very clear. Developments, such as those adjacent to Parvis Road, are required to submit a Transport Assessment and Travel Plan, clearly setting out how the travel needs of occupiers and visitors will be managed in a sustainable manner. Proposals that deliver improvements and increased accessibility to cycle, pedestrian and public transport networks are supported. These policies would also apply to future development proposals in the Borough.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any

development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

Whilst the Council sympathises with the concerns about local road and pavement repairs, it should be noted that the funding streams to address these issues are often from different sources. The Council has adopted the community infrastructure levy (CIL) as the primary means for securing developer contributions towards strategic infrastructure provision associated with that development, including transport infrastructure. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions may also be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. A portion of the money raised may be directed to Surrey County Council to fund education or highway improvements. Thus a benefit of new development is the contribution it can make in funding local infrastructure improvements.

The representation regarding disruption to the existing community due to roadworks associated with construction is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

All Members of the Council will now have the opportunity to consider the representations to this consultation, including the views expressed in this one, and decide which overall site allocation strategy they wish to publish for Regulation 19 consultation and submit to the Secretary of State for examination. The views expressed by local residents will be key in making this decision.

**Contributor Reference:** 02672/1/001  
**Customer Name:** Mrs Pauline Marshall

**Summary of representation:**

Objects to the proposal.

The A320 is already congested, as the main route to the hospital and the motorway.

It would be difficult for a new community to integrate with the existing area.

The nearby Fairoaks, Wisley airfield and Longcross proposals should also be taken into account.

Also, however, concerned about the developments around Saunders Lane. There is too much development to enable the new residents to mix in with the existing residents. The new school and leisure facilities will make this area become part of the town, and lose the small residential character that it has now.

**Officer Response:**

Objection is noted. Some of the issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, including traffic impacts on the A320, and infrastructure provision whilst taking into account nearby proposals such as that at Fairoaks.

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fairoaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites. The Council is also working with Guildford Borough Council planning officers who are proposing the allocation of Wisley airfield for development.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

There have been some good examples in the past of new communities integrating well with existing communities, for example, the Goldsworth Park development. With sufficient provision of infrastructure (see the Topic Paper referenced above for further details), the Council is confident that successful integration with the existing community could be achieved at any of the sites proposed for development, including that at Saunders Lane.

Section 23 of the Regulation 18 consultation Issues and Matters Topic Paper explains how the character of the existing area will not be undermined with new development. Section 15 describes how none of the originally proposed allocations, including those around Saunders Lane, would lead to unacceptable urban sprawl, even when taking the new development along Egley Road into account.

**Contributor Reference:** 02671/1/001  
**Customer Name:** Mrs Hannah Lane

**Summary of representation:**

Objects to the Martyrs Lane proposal.

Horsell Common Preservation Society own part of the site and objects to the inclusion of its land in the site. It also objects to the proposal of housing development at this location. Copy of the letter of objection from HCPS is attached to this representation.

Aware of the effect of the increase of visitors to the Common, which includes:

The more visitors the more the paths get worn away and widened.

Visitors do not keep to the paths and cause damage to flora and fauna. Trampling destroys habitats of many ground living insects. There is an extensive number of species living on the common and as such it is the largest and most important wildlife site in the borough. It should not be put at risk of degradation by placing most of Woking's future housing developments on its doorstep.

The increase in visitors to the common also effects the habitats of birds due to disturbance.

The Common is heavily used by dog walkers which also affect the habitats of birds. Although SANGs and open space are being provided as an alternative for dog walkers, many still use the common.

The provision of SANGs within the Martyrs Lane site would help mitigate any impact but only slightly. People will use the common as it is more interesting and each new development adds to the existing number of residents visiting the commons.

Fairoaks Airport is also identified for development alongside other proposed development north of Martyrs Lane in Ottershaw. Even if all of these proposed developments includes SANGs, there would still be an increase in visitors to the Common. As the sites are located across three boroughs, there is no requirement for joined up thinking on the matter.

The A320 is already at capacity and any proposals to mitigate development by widening this road will seriously effect Horsell Common.

Attached is the letter from HCPS.

**Officer Response:**

Objection to the Martyrs Lane proposal is noted.

The Council has prepared a land ownership map of the land east of Martyrs Lane and is aware of the part of the land in the ownership of HCPS. It is not intended that this part of the site will be developed. It is included to ensure the defensible boundary of the Green Belt. To put it into context, the land in the ownership of HCPS is about 1.42 hectares (approximately 1.3% of the entire land). Most of the land is either Common Land, in Flood Zones 2 and 3 or within the SPA. The consultation document makes it clear that these areas will not form part of the developable area.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

Natural England submitted representation in response to the consultation. It does not have any objection in principle to the safeguarding of the site. It notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed.

It should also be noted that fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will always learn lessons from similar existing sites and work in partnership with Natural England to agree appropriate measures of mitigation for any potential proposal.

Regardless of whether the Council safeguards the land to the east of Martyrs Lane or the original six sites for future development needs, a detailed ecological assessment of the proposed development site will be required at the development management stage. This assessment would carefully consider any ecological or habitat features within and adjacent to the site.

It should also be noted that environmental organisations such as the Environment Agency and Surrey Wildlife Trust have been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the site as well as important ecological sites adjacent to Martyrs Lane can be protected.

As part of the Thames Basin Heaths SPA Avoidance Strategy, the Council seeks developer contributions for Strategic Access Management and Monitoring (SAMM) to monitor and manage the impact of people using the SPA. This includes encouraging people to use the SANGs rather than the SPAs. The information gathered from the monitoring will also be used to inform any future updates of the Avoidance Strategy if it is considered to be an ineffective method of avoiding harm to the SPAs.

Regarding the representation on development in neighbouring boroughs and the lack of joined up thinking, it is correct that it is up to the individual boroughs and districts within the Thames Basin Heaths Special Protection Area to apply the avoidance measures when determining planning applications. Nevertheless, the Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and therefore ensures that a common mitigation approach is applied across all relevant boroughs and districts.

The representation on the A320 has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper. At this stage the Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. These mitigation measures will also take into account any ecological or physical constraints.

Whilst a number of the representations raised relate to management issues, such as footpath widening, the Council is committed to working in partnership with the relevant stakeholders such as HCPS to ensure the long term protection of all of the SPAs and other Commons and habitats within the borough where practical and feasible.

The attached representation from Horsell Common Preservation Society has been considered and addressed separately.

**Contributor Reference:** 01431/1/001  
**Customer Name:** Guildford Borough Council

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 01430/1/001  
**Customer Name:** Ms Gillian Wilder

**Summary of representation:**

Woking needs to accommodate young families and despite the concerns of local people this site would represent a pragmatic approach.

**Officer Response:**

Support for the site is noted.

Regardless of whether the Council decides to allocate the land to the east of Martyrs Lane or the six original safeguarded sites, the Council will make sure that development reflects local housing need as set out in the latest Strategic Housing Market Assessment. This will be the case irrespective of whether it is a single site or multiple sites.

**Contributor Reference:** 01425/2/001  
**Customer Name:** Ms Lynette Dwyer

**Summary of representation:**

Objects to the proposed safeguarding of the site. It would lead to the destruction of wildlife and Green Belt. It would result in significant flooding and traffic congestion. The increase in traffic will also be detrimental to the environment and the health and well being of residents.

There has already been a loss of Green Belt.

Wildlife has become endangered due to mass housing already.

Flooding is the result of a lack of run off for heavy rain.

Public transport can not cope whilst the existing roads are unable to cope with the additional usage based on sinkholes and potholes.

Urge the Council not to ruin the woodland, destroy the wildlife and cause chaos in the community. Woodland should not be touched as they contain endangered species. Hopes that Surrey Woodland Trust is looking into this.

**Officer Response:**

The representation regarding flooding, woodland, wildlife and traffic has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. This also includes the representation relating to sinkholes.

Whilst the Council notes the representation regarding the loss of Green Belt land, the case for doing so has already been established during the preparation of the Core Strategy, which is an adopted Council document. The Council is also of the opinion that its approach to releasing Green Belt land for development needs is consistent with national planning policy. The focus of this specific consultation is to consider the merits of the Martyrs Lane site and ensure that the proposed allocations in the Regulation 19 version of the Site Allocations DPD are the most sustainable when compared against other reasonable alternatives.

In terms of environmental pollution, this will be considered and appropriately mitigated at the Development Management stage. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

It should be noted that potholes are the responsibility of the County Highways Authority and not the borough council. The highways authority has a rolling highway maintenance

programme in place (Surrey Horizon) and this includes the A320 for the next maintenance period.

As part of the consultation the Council has consulted with the relevant environmental and wildlife organisations including Natural England, the Environment Agency, Horsell Common Preservation Society and the Woodland Trust. Their comments will be addressed and used to inform the Council's preferred safeguarding strategy.

**Contributor Reference:** 01441/1/001  
**Customer Name:** Mr Oliver Foreman

**Summary of representation:**

New development across various areas is tolerable for the community as the strain on resources and road infrastructure is spread. The substitution of these sites for one will cause chaos on the roads, affect house prices and put a strain on local resources. For these reasons the original proposals should remain.

**Officer Response:**

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It should be noted that changes to property values are not a material planning consideration. Nevertheless through the provision of necessary and appropriate infrastructure and the delivery of high quality housing, it is not expected that the allocation of any of the sites will have a negative impact on the local property market.

**Contributor Reference:** 01443/1/001  
**Customer Name:** Ms Sarah Bounds

**Summary of representation:**

Concerned about the proposals to develop on Green Belt in Pyrford.

The Pyrford sites have amenity value as they are used for recreation. They also form part of the local farming setting and have natural beauty.

The Martyrs Lane proposal provides the opportunity to create a purpose built development of houses and amenities on a site with no intrinsic beauty. It is served by a good network of roads and has been partially taken out of the Green Belt with the nearby McLaren Factory.

This option saves the unique rural landscape around Pyrford as well as relieves pressure that would have been put on the already overstretched infrastructure in other parts of the borough. The proposed allocation will give planners the chance to create an attractive, contemporary, integrated area of housing and amenities which will better serve the borough of Woking, now and into the future.

Urge the Council to proceed with this proposal. It will also help to preserve the character of the village around the borough.

**Officer Response:**

The representations relating to heritage, local character and amenity have been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council has carried out a number of landscape assessments during the preparation of the Site Allocations DPD. This includes the Green Belt boundary review, a detailed borough wide Landscape Character Assessment and the Martyrs Lane Landscape Assessment and Green Belt Review. These documents are available on the Council's website. These documents should provide the basis upon which the Council should make its judgement about how the site to the east of Martyrs Lane compares with the six original sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);

- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

Although part of the Martyrs Lane site was previously granted planning permission for a factory associated with McLaren Technologies, it should be noted that the permission did not remove the site from the Green Belt. In addition, the development management process is a distinct different process to that of the Site Allocations DPD plan making process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of the planning history of the site, the conclusions of the two independent landscape studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council also has a number of policies and best practice guidance to ensure that all future development is of high quality and integrated into the existing local context in order to achieve sustainable development and the overall spatial vision of the borough.

**Contributor Reference:** 01444/1/001  
**Customer Name:** Ms Janet Deacon

**Summary of representation:**

Support for the proposal.

The infrastructure already exists and due to the size of the site it is more cost effective to provide other infrastructure. There is good employment opportunities in the area, resulting in less travel time to work and therefore less pollution. There are good transport links. There are no flooding issues. A brownfield site near McLaren had previously been granted planning permission. The site is large enough to accommodate affordable housing. It is also large enough to expand the housing to accommodate future needs.

**Officer Response:**

Support for the Martyrs Lane site is noted. The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. However none of these buildings fall within the site boundary that was previously granted planning permission for a factory associated with McLaren Technologies.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site

Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

**Contributor Reference:** 01461/1/001

**Customer Name:** Mr Rod Steel

**Summary of representation:**

This is a more suitable site than the land to the east of Upshot Lane. There will be fewer traffic and other impacts and it is important that this Green Belt site is protected.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst the representation notes that the Pyrford site should be preserved, the overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

**Contributor Reference:** 01467/1/001  
**Customer Name:** Mr Richard Wyld

**Summary of representation:**

Landowner within the Martyrs Lane site and supports the proposed safeguarding allocation. The site is adjacent to the urban area and is suitable for development.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The availability of land is a significant material consideration for the Council to take into account in deciding its preferred approach to safeguarding for the purposes of the Regulation 19 consultation. This representation clarifies the availability of the site for future development needs.

In deciding on its preferred approach to safeguarding, the Council must ensure that the sites selected are the most sustainable compared against other reasonable alternatives and that any land removed from the Green Belt will not undermine its overall purpose and integrity.

**Contributor Reference:** 01465/1/001  
**Customer Name:** Mr Godfrey H Chapples

**Summary of representation:**

Representation from a concerned Byfleet resident.

How well do you know the Martyrs Lane site, would it be possible to provide contact details to gain access to the site?

Aware of the problem of identifying sites in the Site Allocations DPD as everyone objects to development. This is not sustainable as development has to continue with a growing population. However several areas have reached saturation point when infrastructure provision is considered. Infrastructure must be a consideration for every potential development as should flood risk, gridlock and fumes which have implications on health and the cost of living.

Government must be taught by professional experts on the following issues.

Flood alleviation – Byfleet requires repairs, alleviation and drainage. All areas in the flood plain should not be permitted until a flood alleviation plan has been completed by the Environment Agency, Thames Water and Government in Action.

Highways – Wider roads with passing places and lay by facilities, more mini roundabouts and traffic lights.

Education – More schools for all ages

Healthcare – More surgeries and consultation facilities, hospital beds, social care. A complete reassessment of all requirements by each and every settlement location divided into the various sizes of new housing.

Leisure, business, countryside, wildlife and more should also be considered.

Density of development must be carefully assessed for all of the sites before permitting further development.

Every local authority does this now but this should be planned at a county and then national level for it to be delivered effectively. This is not helped by governments changing every 4-5 years.

There must be a referendum or methodology in place to resolve these issues and ensure that a strategic list of infrastructure importance is agreed and funded over a long period. Alternatively it could be within the NPPF for the period 2027 to 2040.

Development in this plan period must concentrate development within the existing urban area to preserve the Green Belt and ensure that a sensible national plan is in place between 2027 and 2040. Proposals on brownfield land should be permitted in most circumstances.

We should look after the interests of local residents but also be sympathetic towards others in adjacent areas. We all wish for a contented peaceful lifestyle in Surrey. Lets proceed to assist Council's in providing the planning system we feel is appropriate to local needs.

**Officer Response:**

The land to the east of Martyrs Lane is in the ownership of several different public and private organisations and individuals. If access to the site is required, then it is recommended that the representor contacts the landowners directly to arrange visits. It is not the Council's responsibility to arrange a site visit.

The Council has an adopted Core Strategy and has prepared the Site Allocations DPD to facilitate the comprehensive delivery of the Core Strategy. This includes 4964 net additional dwellings, 48000sqm of office and warehousing floorspace and 93900sqm of retail floorspace. As set out in Policy CS1, most of the new development will be directed to previously developed land in the town, district and local centres, which offer the best access to a range of services and facilities. The scale of development that will be encouraged in these areas will reflect their respective functions and nature. The Core Strategy also sets out indicative density ranges in Policy CS10: Housing provision and distribution. It should be noted however that these density ranges set out will depend on the nature and sustainability of the site and influenced by design.

The Council will make sure that the development of any land that it safeguards and allocates for development is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions (CIL Regulation 123 List). This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Regarding the representation on cross boundary infrastructure issues such as education and healthcare provision, the Council has addressed this as part of the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council is aware of flooding across the borough. Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. Regardless of the Council's preferred safeguarding option, based on the location and size of all of the proposed safeguarded sites, a detailed flood risk assessment will be a requirement of any development proposal that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Local Plan. Policy CS9 also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development. As part of the plan making process, the Council has undertaken a Strategic Flood Risk Assessment and taken this into account in identifying sites in the Site Allocations DPD. At the Development Management stage, the Council would also consult with the Environment Agency on flooding matters. It may also choose to consult with Thames Water on water management issues.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The social and environmental implications of the proposed allocations will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

Regarding the representation on leisure and business, the draft Site Allocations DPD sets out a number of sites across the Borough that will facilitate the delivery of additional public open space (SANGs) as well as a wide range of sites for employment uses. The allocation of these sites should assist in meeting the objectives set out in the Core Strategy, in particular policies CS8: Thames Basin Heaths SPA, CS15: Sustainable economic development and CS17: Open space, green infrastructure, sport and recreation.

The Council has addressed the representation on wildlife for the land to the east of Martyrs Lane in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. Additionally, the Council has also addressed this issue in the Regulation 18 consultation Issues and Matters Topic Paper which is available online.

Whilst regional planning was abolished by central government following the implementation of the NPPF, the Council is required under the Duty to Cooperate to work with neighbouring authorities and key stakeholders to address cross boundary issues such as infrastructure

provision. A Duty to Cooperate statement will be published in due course to demonstrate the extent of cooperation between the authorities and indeed with other relevant organisations. The proposals of the DPD are informed by comments from the County Council and other stakeholders both formally and informally. The Council is committed to continue to work positively with these organisations throughout the Site Allocations DPD process and beyond to address common and strategic infrastructure issues of the area.

As set out above, the Council has a Regulation 123 List which contains the strategic infrastructure projects of priority in the borough. This list will be reviewed on a regular basis to reflect existing and future infrastructure needs.

The principle of Green Belt development and the Council's approach to safeguarding has already been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Based on the policy requirements set out above and the necessary mitigation and infrastructure measures that development will have to deliver, the Council is confident that the proposed safeguarding of land for future development needs will not have a significant adverse impact on the quality of life for existing or future residents.

**Contributor Reference:** 01473/1/001

**Customer Name:** Mr Tim Lane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01474/1/001  
**Customer Name:** Shankoof Afiq

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01475/1/001  
**Customer Name:** Ms Lucy Rissik

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01476/1/001

**Customer Name:** Paula

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01477/1/001  
**Customer Name:** Ms Angela Brightwell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01478/1/001  
**Customer Name:** Mr Michael Soutar

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01479/1/001  
**Customer Name:** Mr Peter Izzard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01480/1/001

**Customer Name:** Alex Kay

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01481/1/001  
**Customer Name:** Ms Laura Conn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01482/1/001  
**Customer Name:** Mr Christopher J Hughes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01483/1/001  
**Customer Name:** Ms Lucy Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01484/1/001  
**Customer Name:** Mr Tom Currie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01485/1/001  
**Customer Name:** Ms Angela Palmer Melham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01486/1/001  
**Customer Name:** Mr Graham Loughrey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01487/1/001  
**Customer Name:** Ms Victoria Udall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01488/1/001  
**Customer Name:** Mr Thomas Gracey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01489/1/001  
**Customer Name:** Ms Jacqueline Gracey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01490/1/001  
**Customer Name:** Mr Carl Henderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01491/1/001  
**Customer Name:** Ms Helene Millou

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01492/1/001

**Customer Name:** Puja

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01448/1/001  
**Customer Name:** Ms Louise Dams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01449/1/001  
**Customer Name:** Mr John Rymill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01449/2/001  
**Customer Name:** Mr John Rymill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01450/1/001  
**Customer Name:** Ms Jenny Jordan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01451/1/001  
**Customer Name:** Mr Brian Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01452/1/001  
**Customer Name:** Mr Richard A Bligh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01453/1/001  
**Customer Name:** Ms Susan Cast

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01454/1/001  
**Customer Name:** Mr David Spiller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01455/1/001  
**Customer Name:** Mr Neville Godwin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01456/1/001  
**Customer Name:** Ms Fran Campbell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00120/1/001  
**Customer Name:** Ms Nicola Glen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01457/1/001  
**Customer Name:** Mr Mark Lawn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01458/1/001  
**Customer Name:** Mr Paul Winterford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01459/1/001

**Customer Name:** Ms Sylvia Cox

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01460/1/001  
**Customer Name:** Linsey Meredith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00024/5/001  
**Customer Name:** Ms Tammy Dexter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01462/1/001  
**Customer Name:** Ms Nicola Quibell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01463/1/001

**Customer Name:** Ms Anne Lee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01464/1/001

**Customer Name:** Bianca

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01466/1/001  
**Customer Name:** Agnieszka Duffin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01468/1/001  
**Customer Name:** Ms Kathryn Reed

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01469/1/001  
**Customer Name:** Ms Rachael Stewart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01470/1/001  
**Customer Name:** Ms Caroline Sheppard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01471/1/001

**Customer Name:** Freda Loring

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01472/1/001

**Customer Name:** lovana

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01424/1/001  
**Customer Name:** Ms Sara Garton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01425/1/001  
**Customer Name:** Ms Lynette Dwyer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01426/1/001  
**Customer Name:** Mr Luke Palmer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01427/1/001  
**Customer Name:** Ms Julia Crompton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01428/1/001  
**Customer Name:** Ms Liz Palmer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01429/1/001

**Customer Name:** Mrs C Parris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01432/1/001

**Customer Name:** Ms Gill Head

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01367/1/001  
**Customer Name:** Mr Andrew Stonhold

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01368/1/001  
**Customer Name:** Mr Paul James Malynn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01369/1/001  
**Customer Name:** Mr Andy Penton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01370/1/001  
**Customer Name:** Mr Graeme Stewart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01371/1/001

**Customer Name:** C Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01372/1/001  
**Customer Name:** Ms Jacci Penton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01373/1/001

**Customer Name:** Ms Eileen Tomkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01374/1/001  
**Customer Name:** Mr Alf Tomkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01375/1/001  
**Customer Name:** Ms Nicole Horsburgh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01376/1/001  
**Customer Name:** Mr Eddie Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01377/1/001  
**Customer Name:** Ms Betty Summers

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01378/1/001

**Customer Name:** Mr Jonathan Walrond

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01379/1/001

**Customer Name:** Alex Whindle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01380/1/001

**Customer Name:** Mr R Dolton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01381/1/001

**Customer Name:** Mr Alan Howe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01382/1/001  
**Customer Name:** Ms Mary Wright

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01383/1/001  
**Customer Name:** Ms Andrea Bird

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01384/1/001  
**Customer Name:** Mr Richard Palk

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01385/1/001  
**Customer Name:** Ms Shelley Zambardi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01386/1/001  
**Customer Name:** Mr Tony Zambardi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01387/1/001

**Customer Name:** Mrs J Bendell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01388/1/001  
**Customer Name:** Ms Jennie Thorpe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01389/1/001

**Customer Name:** Mr D Allum

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01390/1/001  
**Customer Name:** Ms Laura FitzPatrick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01391/1/001  
**Customer Name:** Mr David FitzPatrick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01392/1/001

**Customer Name:** Ms Sara Mule

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01332/1/001

**Customer Name:** Mr Alan Burt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01333/1/001

**Customer Name:** Ms Maria Burt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01334/1/001  
**Customer Name:** Ms Chloe Burt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01336/1/001  
**Customer Name:** Mr Barry Daniels

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01338/1/001  
**Customer Name:** Mr Peter Soutar

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01339/1/001  
**Customer Name:** Mr Stephen Pheasant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01340/1/001  
**Customer Name:** Mr Chris Pearce

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01341/1/001  
**Customer Name:** Mrs Jean Knox

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01342/1/001  
**Customer Name:** Mr Anthony Dunn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01343/1/001  
**Customer Name:** Mr David Simmonds

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01345/1/001  
**Customer Name:** Ms Fiona Richards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01346/1/001  
**Customer Name:** Mr Jeffrey Pearce

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01347/1/001  
**Customer Name:** Mr Michael Waugh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01348/1/001  
**Customer Name:** Mr Anthony Percy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01349/1/001  
**Customer Name:** Mr Jon Patient

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01350/1/001  
**Customer Name:** Mr Matthew Payne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01351/1/001  
**Customer Name:** Mr Manuel Portelinha

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01352/1/001  
**Customer Name:** Ms Kirsty Payne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01353/1/001  
**Customer Name:** Ms Carol Payne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01354/1/001

**Customer Name:** Mr D Leddy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01355/1/001  
**Customer Name:** Ms Emma Freeth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01356/1/001  
**Customer Name:** Mr Peter Chiverton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01357/1/001  
**Customer Name:** Waheeda Edwards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01360/1/001  
**Customer Name:** Ms Joanne Barry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01362/1/001

**Customer Name:** Mr Guy Barry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01365/1/001  
**Customer Name:** Mrs A M Bidwell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01366/1/001  
**Customer Name:** Mr Terry Lillington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01393/1/001

**Customer Name:** Mr Luigi Mule

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01394/1/001  
**Customer Name:** Mr Joseph Mule

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01395/1/001  
**Customer Name:** Ms Maria Mule

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01396/1/001  
**Customer Name:** Ms Gabriella Mule

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01397/1/001  
**Customer Name:** Ms Lynne Rainbird

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01398/1/001  
**Customer Name:** Mr Dave Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01398/2/001  
**Customer Name:** Mr Dave Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01401/1/001  
**Customer Name:** Ms Pamela Vivian

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01403/1/001  
**Customer Name:** Ms Clare Hickford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01404/1/001  
**Customer Name:** Ms Sue McDonald

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01406/1/001  
**Customer Name:** Mr Richard Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01407/1/001  
**Customer Name:** Ms Lisa Kuner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01408/1/001  
**Customer Name:** Ms Melanie Alderman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01409/1/001  
**Customer Name:** Mr Royston Alderman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01410/1/001  
**Customer Name:** Ms Celia Jaffreys

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01411/1/001  
**Customer Name:** Mr Ryan Alderman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01412/1/001  
**Customer Name:** Mr Paul Griffiths

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01414/1/001  
**Customer Name:** Mr David Bower

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01415/1/001  
**Customer Name:** Agnieszka Geborek

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01416/1/001  
**Customer Name:** Mr Grahame Arnold

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01417/1/001  
**Customer Name:** Ms Jenny Eldridge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01418/1/001  
**Customer Name:** Mehreen Saeed

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01419/1/001  
**Customer Name:** Ms Fiona Fortson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01420/1/001  
**Customer Name:** Ms Kim Vincent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01421/1/001  
**Customer Name:** Mr Andrew Ayres

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01423/1/001  
**Customer Name:** Ms Natahsa Ruparalia

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01337/1/001  
**Customer Name:** Ms Judith Knott

**Summary of representation:**

The existing infrastructure is not suitable for this proposal.

Use brownfield sites rather than destroying the Green Belt.

**Officer Response:**

The representation regarding infrastructure has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council has previously addressed the representation regarding the principle of Green Belt development during the Regulation 18 consultation of the Site Allocations DPD. Please refer to the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 01344/1/001  
**Customer Name:** Dr Martin Christie

**Summary of representation:**

Supports the proposal. The merits of the site include:

Economies of scale would make it easier to resolve infrastructure requirements such as water, waste and electricity. This would also result in less disruption to residents and traffic than providing this infrastructure on six separate sites.

Land values are lower than the six sites and therefore facilitate the provision of affordable housing within the borough. Housing in Pyrford is expensive and executive homes will not provide key worker homes needed by local employers.

There are three large employers close to the site. Key worker housing can be provided for these employees and there is bus access to St Peters Hospital.

The site could accommodate new infrastructure and at a cheaper cost than the original sites. There would also be no disruption to existing communities. The proposals for development in the West Byfleet area will have a significant impact on the local road network and is already more than enough for the Pyrford and West Byfleet area.

The SCC traffic reports show that 900 dwellings at Martyrs Lane will have less impact on traffic conditions than the development proposed for Mayford or the combination of developments proposed for Byfleet and Pyrford. Martyrs Lane would alleviate the congestion likely in West Byfleet. The Martyrs Lane site has the benefit of main road links to Woking, Chertsey and the M25. Safeguarded sites in Pyrford and Byfleet are accessed by B or C roads. Traffic flow along the A245 through West Byfleet and over the M25 bridge is close to theoretical maximum.

The existing roundabout at the northern end of Martyrs Lane would enable easy access for both development and resident vehicles to the A320.

The West Byfleet Health Centre is at capacity and a new health facility could be built on the Martyrs Lane site.

Pyrford Junior School is at capacity and a new school could be built on the Martyrs Lane site.

Martyrs Lane has a better bus service than the other sites.

The Green Belt in Pyrford is used for recreation purposes. Martyrs Lane is not easily accessible and rarely used by the public.

The Green Belt in Pyrford is an important element of the heritage setting of the area and is adjacent to a number of heritage assets and designations. Martyrs Lane has limited footpaths

and no known heritage value. It is also not an integral feature of local designated heritage sites.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

In addition to the above, the Council has already addressed a number of these issues relating to the six original sites in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 01335/1/001  
**Customer Name:** Ms Elizabeth Lawrence

**Summary of representation:**

The proposal would create too much traffic for the roads to be able to manage.

**Officer Response:**

This representation has been addressed by the Council in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 01399/1/001  
**Customer Name:** Mr Ian Makowski

**Summary of representation:**

Supports the proposed safeguarding of Martyrs Lane for future development needs.

The NPPF states that brownfield land should be used before Green Belt. If exceptional circumstances exist then this should apply to the Martyrs Lane site.

The Green Belt in Pyrford has been farmed for centuries and undeveloped. It is an important landscape feature in the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The Martyrs Lane site by contrast has no current use at all.

Planning permission has been granted for a factory in the northern section of the site, which has been revoked on request of the applicant. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. The land also includes a former army camp and landfill site. The site to the north is semi-derelict, unused, uncared for and overgrown woodland. It is pre-developed land in the Green Belt. The sites should have been initially prioritised by WBC.

There has been confusion regarding the number of dwellings required to be safeguarded. The Pyrford Neighbourhood Forum maintains that 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

## Officer Response:

Support for the Martyrs Lane site is noted.

As addressed in the Council's Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has been established and is consistent with national policy. Therefore the focus of the land to the east of Martyrs Lane consultation should be about ensuring that the proposed allocations put forward by the Council in the Regulation 19 version of the Site Allocations DPD are the most sustainable when compared against other reasonable alternatives.

The representations relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The land to the east of Martyrs Lane Consultation Paper is very clear about the purpose of the consultation and the quantum of development that the Council considers the site can deliver. Therefore the 1200 net additional dwellings as set out in the consultation paper is broadly similar to the total of the six original sites set out in the Regulation 18 Site Allocations DPD.

The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close

proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values.

The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding point 10 of the representation the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Whilst the merits of the Martyrs Lane site have been noted, it would be incorrect to state that the site is not used for recreational activities as it contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. As part of the consultation, the Council has consulted with Sport England and their comments will be addressed separately and will be used to inform the Council's decision on its preferred safeguarding strategy.

**Contributor Reference:** 01400/1/001

**Customer Name:** C M Heath

**Summary of representation:**

The traffic on the adjoining roads are at capacity and development would make the situation worse.

Other sites are still available for development such as the former Camphill Tip and Industrial Estate. Development on these sites would require road mitigation measures including road widening and a roundabout.

**Officer Response:**

The Council has addressed the representation on traffic and congestion in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Regarding the suggestion of using Camphill Tip and Industrial Estate for residential development, the Council is proposing to allocate the former waste site for employment uses. This is identified as site UA49 in the draft Site Allocations DPD. It is important to highlight that the Site Allocations DPD seeks to facilitate the delivery of housing, employment and retail floorspace and identifying sites for employment uses is an important part of delivering the overall spatial vision of the borough. Therefore the loss of a designated employment site would not assist in delivering the economic objectives of the Core Strategy.

Nevertheless the Council is working in partnership with the County Highways Authority to identify specific traffic and road mitigation measures to ensure that the allocation of all of the sites in the DPD will not led to an adverse impact on the highway network.

**Contributor Reference:** 01402/1/001  
**Customer Name:** Mr Neil McEvoy

**Summary of representation:**

Supports the proposed safeguarding of Martyrs Lane for future development needs.

The site has direct access to the A320 and M25. The A320 can be easily upgraded if needed and minimise the impact of additional traffic for the rest of the borough. The other sites are in village locations with overcrowded and unsafe roads. Access to the Pyrford sites is limited with no scope to improve. They also flood.

The scrub land at Martyrs Lane has little amenity value. Pyrford Green Belt is used for recreational purposes.

The existing education and medical facilities in Pyrford, Mayford and Byfleet are at capacity with no scope for extension. Martyrs Lane could include new facilities.

**Officer Response:**

Support for the Martyrs Lane site is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is wrong to assume that development at Martyrs Lane would help alleviate congestion in other parts of the borough than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on landscape and amenity, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The representation regarding amenity has been addressed in the Council's Regulation 18 consultation Issues and Matters Topic Paper.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 01405/1/001  
**Customer Name:** Mr Roger Breeden

**Summary of representation:**

The site should be retained as Green Belt for wildlife and to support the environment.

The existing infrastructure will not be able to cope with additional people and traffic.

Development should take place on brownfield sites and more flats in Woking Town Centre supported by enhanced public transport.

**Officer Response:**

As set out in the Regulation 18 consultation Issues and Matters Topic Paper, the Council is required to identify land within the Green Belt to meet development needs. The Council considers the case for doing so to be based on robust evidence and in line with national planning policy. Within this paper, the Council has also set out how the sites have been identified and the assessments carried out on brownfield sites. The topic paper is available on the Council's website.

The focus of this consultation is to ensure that all reasonable sites have been considered and that the most sustainable sites are allocated for future development.

During this consultation the Council has consulted with the relevant environmental and wildlife organisations including Natural England, the Environment Agency, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and will be used to inform the Council's final decision on its preferred safeguarding strategy.

The representation regarding infrastructure has been addressed by the Council in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

It should be noted that the draft Site Allocations DPD contains a significant number of sites within the town centre that will facilitate the delivery of additional housing. However it is important that development meets local housing needs and therefore family housing is delivered in addition to flatted developments in the town centre. The housing need of the Borough is set out within the Strategic Housing Market Assessment and reflected in Core Strategy Policy CS10 and CS11.

The Council is working in partnership with the County Council and public transport operators to explore and determine feasible and deliverable strategic highway and public transport measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 00543/2/001  
**Customer Name:** Mr Peter Graves

**Summary of representation:**

Objects to the proposal to use Green Belt land in Pyrford for future development needs.

The NPPF states that brownfield land should be used before Green Belt. If exceptional circumstances exist then this should apply to the Martyrs Lane site.

The Green Belt in Pyrford has been farmed for centuries and undeveloped. It is an important landscape feature in the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The Martyrs Lane site by contrast has no current use at all.

Planning permission has been granted for a factory in the northern section of the site, which has been revoked on request of the applicant. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. The land also includes a former army camp and landfill site. The site to the north is semi-derelict, unused, uncared for and overgrown woodland. It is pre-developed land in the Green Belt. The sites should have been initially prioritised by WBC.

There has been confusion regarding the number of dwellings required to be safeguarded. The Pyrford Neighbourhood Forum maintains that 1024 dwellings are needed based on the anticipated capacity of the six safeguarded sites from the Regulation 18 consultation.

There is no need to build on the New Zealand Golf Course as the northern section of the site is 36.7ha. This is greater than the site area of the six original safeguarded sites and can accommodate the 1024 dwellings required.

The Green Belt Boundary Review notes that Parcel 9 has very low suitability for removal from the Green Belt and is described as land that is fundamental to the Green Belt. The Martyrs Lane site has low suitability and therefore should be selected before the two sites in Pyrford.

The Brett report considered Pyrford land to have Major Environmental Constraints. The land is Grade 3 agricultural land with some with some Grade 2. The parcel is also identified as an 'Escarpment and rising ground of Landscape importance.' This designation is protected in Woking Core Strategy CS24. Martyrs Lane falls into category Minor Constraint and should therefore be selected for safeguarded development land ahead of the Pyrford sites.

The Green Belt boundary review notes that Parcel 9 has little or no capacity for change. It is considered to have a strong unspoilt rural character as referenced in the Surrey Landscape Character Assessment and the Pyrford Neighbourhood Plan. The Martyrs Lane site has low capacity for change and no local or national landscape designations. It has also been partially developed.

One larger site would provide economies of scale, making it easier to resolve infrastructure issues when compared with six separate sites spread across the borough. Fewer residents would be impacted by traffic disruption from a single site rather than that incurred by six separate sites.

Land values on this site are lower than the other sites and this would facilitate the delivery of affordable housing within the Borough. Development in Pyrford would result in executive housing that would not benefit key workers at local employers.

There are major employers in close proximity with good bus connectivity to the site.

The provision of additional infrastructure would be more cost effective than the original sites. There would also be no disruption to existing communities. Current development proposals in West Byfleet are more than enough for Pyrford and West Byfleet.

Evidence suggests that Martyrs Lane would have less impact on traffic conditions than the development proposed for Mayford or the combination of development proposed for Byfleet and Pyrford. This site would alleviate congestion in West Byfleet. The site benefits from road links to Woking, Chertsey and the M25. The sites in Pyrford are only accessed by B or C Roads. The traffic flow over the A245 in West Byfleet and over the M25 is at capacity. The existing roundabout on Martyrs Lane would enable easy access to the development.

The West Byfleet Health Centre and Pyrford Junior School are at capacity and there is the opportunity to build new facilities within the Martyrs Lane site.

Martyrs Lane has better bus services than the other sites.

The Pyrford Green Belt is used for recreational purposes whilst the Martyrs Lane site is not easily accessible and rarely used by the public.

The Pyrford sites are an integral part of the setting of local heritage assets and the semi-rural character of the area. Martyrs Lane has no known heritage value.

The site is well contained by urban boundaries to the north and west and golf course to the south. No requirement to allocate all 112ha for housing.

The site is not utilised for leisure or recreation.

Martyrs Lane can provide a viable direction for WBC housing expansion which will provide new homes in an area which has capacity instead of trying to further overload the areas encompassed by the six original sites safeguarded sites in Byfleet, Pyrford, Hook Heath and Mayford.

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Objection to development in Pyrford is noted.

As addressed in the Council's Regulation 18 consultation Issues and Matters Topic Paper, the Council is of the opinion that the case for releasing Green Belt land, including safeguarding land to meet future development needs, has been established and is consistent with national policy. Therefore the focus of the land to the east of Martyrs Lane consultation should be about ensuring that the proposed allocations put forward by the Council in the Regulation 19 version of the Site Allocations DPD are the most sustainable when compared against other reasonable alternatives.

The representations relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

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It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

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The references to Peter Brett's report is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and

still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely

unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding point 10 of the representation the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Whilst the merits of the Martyrs Lane site have been noted, it would be incorrect to state that the site is not used for recreational activities as it contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. As part of the consultation, the Council has consulted with Sport England and their comments will be addressed separately and will be used to inform the Council's decision on its preferred safeguarding strategy.

**Contributor Reference:** 01413/1/001  
**Customer Name:** Ms Gail Graves

**Summary of representation:**

Objects to development in Pyrford.

The NPPF states that brownfield land should be used before Green Belt. If exceptional circumstances exist then this should apply to the Martyrs Lane site.

The Green Belt in Pyrford has been farmed for centuries and undeveloped. It is an important landscape feature in the semi-rural character of the area, as highlighted in the Pyrford Neighbourhood Plan. The Martyrs Lane site by contrast has no current use at all.

Planning permission has been granted for a factory in the northern section of the site, which has been revoked on request of the applicant. The Case Officer for the application considered the impact on the green belt and assessed that building at a large scale on the site presented no risk of merger and sprawl. The land also includes a former army camp and landfill site. The site to the north is semi-derelict, unused, uncared for and overgrown woodland. It is pre-developed land in the Green Belt. The sites should have been initially prioritised by WBC.

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The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely

unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. It should also be noted that neither the Martyrs Lane site nor the six original sites contain statutory listed buildings or features. Therefore on this particular matter there is no clear advantage between any of the proposed safeguarded sites.

As set out above, the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

Regarding point 10 of the representation the site boundary (as defined by the red line in the Consultation Document) is the subject of the consultation and if the site were to be safeguarded the Council will carry out further work to determine the nature and where the physical development could be accommodated as well as the necessary green infrastructure to support it. At this stage it would be unreasonable to rule out the New Zealand Golf Course as part of this consideration. The Council's objective for this particular exercise is to safeguard land that will enable the delivery of at least 1,200 homes.

Whilst the merits of the Martyrs Lane site have been noted, it would be incorrect to state that the site is not used for recreational activities as it contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. As part of the consultation, the Council has consulted with Sport England and their comments will be addressed separately and will be used to inform the Council's decision on its preferred safeguarding strategy.

**Contributor Reference:** 01422/1/001  
**Customer Name:** Ms Jackie Wheeler

**Summary of representation:**

Supports the proposed safeguarding of Martyrs Lane for future development needs.

The site is partly previously developed land unlike the other six sites.

The A245 in West Byfleet and over the M25 has no capacity, especially when future development in the area is taken into account.

One site would deliver economies of scale and would help to find solutions to many of the infrastructure concerns.

Pyrford Green Belt is used for recreational purposes.

The Pyrford Green Belt is part of the heritage setting of Pyrford's historic setting.

Pyrford is protected by Policy CS24 as an escarpment and rising ground of landscape importance.

Pyrford's fields have been farmed for centuries and include good quality agricultural land. They also contribute to the rural character of the area and setting for the southern gateway into the town.

In addition, there are currently commercial/brown field sites that would better suit the development of housing, such as that on Boundary Road in Woking.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the overriding objective of this consultation is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, regardless of what sites are allocated. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

Additionally, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Regarding the representation on amenity and heritage, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area. In addition the representation on amenity, heritage and landscape character has previously been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

It is highlighted that the Council has already identified the Monument Way West Industrial Estate in the draft Site Allocations DPD. The site is currently within a designated employment area and the Council is proposing to allocate it for additional employment uses. This site, in combination with the other employment allocations, will help deliver the economic objectives of the Core Strategy and spatial vision for the borough. To clarify the Site Allocations DPD does not just allocate housing sites, its purpose is to facilitate the comprehensive delivery of the Core Strategy including employment, retail, infrastructure and open space requirements.

**Contributor Reference:** 01358/1/001

**Customer Name:** Ms Linda Hall

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, Traveller accommodation and the necessary social and community infrastructure needed to support it. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is within Flood Zone 1 and therefore make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Masterplanning of the site would allow for the provision of affordable housing which is needed in the Borough as the Council is currently not meeting its targets. The site would also be able to accommodate specialist residential accommodation for older people and vulnerable groups.

The site could provide Gypsy and Traveller accommodation for those wishing to live in the east of Woking. All sites are currently in the southwest of the borough. This would also meet the requirements of Policy CS14 and meet Woking's current and future Traveller accommodation needs. Ten Acre Farm can therefore be removed as a Traveller site proposal.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all

ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' accordingly are investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01359/1/001  
**Customer Name:** Ms Pam Lomax

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, Traveller accommodation and the necessary social and community infrastructure needed to support it. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is within Flood Zone 1 and therefore make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Masterplanning of the site would allow for the provision of affordable housing which is needed in the Borough as the Council is currently not meeting its targets. The site would also be able to accommodate specialist residential accommodation for older people and vulnerable groups.

The site could provide Gypsy and Traveller accommodation for those wishing to live in the east of Woking. All sites are currently in the southwest of the borough. This would also meet the requirements of Policy CS14 and meet Woking's current and future Traveller accommodation needs. Ten Acre Farm can therefore be removed as a Traveller site proposal.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

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In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all

ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

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McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' accordingly are investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01361/1/001  
**Customer Name:** Mr Roy Lomax

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, Traveller accommodation and the necessary social and community infrastructure needed to support it. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is within Flood Zone 1 and therefore make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Masterplanning of the site would allow for the provision of affordable housing which is needed in the Borough as the Council is currently not meeting its targets. The site would also be able to accommodate specialist residential accommodation for older people and vulnerable groups.

The site could provide Gypsy and Traveller accommodation for those wishing to live in the east of Woking. All sites are currently in the southwest of the borough. This would also meet the requirements of Policy CS14 and meet Woking's current and future Traveller accommodation needs. Ten Acre Farm can therefore be removed as a Traveller site proposal.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all

assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' accordingly are investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01363/1/001

**Customer Name:** Mr Colin Hall

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, Traveller accommodation and the necessary social and community infrastructure needed to support it. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is within Flood Zone 1 and therefore make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Masterplanning of the site would allow for the provision of affordable housing which is needed in the Borough as the Council is currently not meeting its targets. The site would also be able to accommodate specialist residential accommodation for older people and vulnerable groups.

The site could provide Gypsy and Traveller accommodation for those wishing to live in the east of Woking. All sites are currently in the southwest of the borough. This would also meet the requirements of Policy CS14 and meet Woking's current and future Traveller accommodation needs. Ten Acre Farm can therefore be removed as a Traveller site proposal.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

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Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

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assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

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It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

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The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01364/1/001  
**Customer Name:** Mr Shaun Glanville

**Summary of representation:**

Agrees that the site is the best option for long term development needs.

The principle of development on the site has already been agreed.

The majority of the site is either disused or a golf course that is under used.

The traffic infrastructure for vehicles and cycling already exists.

The proximity to the M25 and major A roads make it cost and development effective.

More cost effective to build one large site then six smaller ones in terms of infrastructure, utilities, leisure and green spaces.

If planned alongside development in Woking Town Centre, it will be a major step forward in meeting the borough's housing needs.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in

ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

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- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

In addition the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The allocation of all of the sites identified in the Site Allocations DPD, regardless of whether they include Martyrs Lane or the other six safeguarded sites, will take into account the cumulative effect of development to ensure that appropriate mitigation and infrastructure improvement measures are identified and delivered.

**Contributor Reference:** 01308/1/001  
**Customer Name:** Mr Steve Barber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01300/1/001  
**Customer Name:** Ms Janice Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01310/1/001  
**Customer Name:** Mr Gerald Knight

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01311/1/001

**Customer Name:** Mr Tim Canty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01312/1/001  
**Customer Name:** Mr Richard Cawthorne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01313/1/001

**Customer Name:** Mrs B L Fogg

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01314/1/001  
**Customer Name:** Ms Anne Hutchinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01315/1/001  
**Customer Name:** Ms Pamela McIntosh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01316/1/001  
**Customer Name:** Ms Danielle Phillips

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01318/1/001  
**Customer Name:** Ms Jenny Emery

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01319/1/001  
**Customer Name:** Ms Sophie Pollard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01320/1/001  
**Customer Name:** Ms Daisy Pollard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01321/1/001  
**Customer Name:** Mr Nicholas Dyer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01322/1/001

**Customer Name:** Mr Nick Dyer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01323/1/001  
**Customer Name:** Ms Rachel Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01324/1/001  
**Customer Name:** Ms Rachel Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01325/1/001  
**Customer Name:** Mr Paul Boddy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01326/1/001  
**Customer Name:** Mr Paul Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01327/1/001  
**Customer Name:** Ms Kerri Cowan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01328/1/001

**Customer Name:** Jane Brooker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01329/1/001

**Customer Name:** Mr William Richards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01330/1/001

**Customer Name:** Mrs Wendy Lumsden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01331/1/001  
**Customer Name:** Ms Laura Webb

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01321/2/001  
**Customer Name:** Mr Nicholas Dyer

**Summary of representation:**

This is a stunning area of nature and the scale of the proposal will have an adverse impact on wildlife.

The local infrastructure and villages will not be able to sustain this amount of development. There has been no information to show that the roads, schools and hospitals can cope with this development.

**Officer Response:**

The representations set out regarding the impact on wildlife and infrastructure have been addressed by the Council in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 01323/2/001  
**Customer Name:** Ms Rachel Evans

**Summary of representation:**

The proposal will have a significant impact on local infrastructure. Makes more sense to distribute development across several areas over time and enhance Woking.

**Officer Response:**

The representation regarding infrastructure provision has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The representation regarding the preferred distribution of development has been noted and will weigh in the balance of considerations by Members when deciding on the Council's preferred safeguarding approach.

**Contributor Reference:** 01317/1/001  
**Customer Name:** Ms Veronica Semon-Ward

**Summary of representation:**

Strongly objects to the proposed safeguarding of the site.

All development should be fairly distributed across the borough, especially as this site is in close proximity to the Thames Basin Heaths SPA.

There are a number of major developments taking place in the local area including Woking Town Centre, Sheerwater Regeneration and Fair Oaks. This will have a negative impact on residents and wildlife in terms of pollution, traffic and amenity. The proposal is therefore unreasonable.

Due to ward boundary changes, Woodham has no local councillor who lives in the area and there is a lack of representation for local residents or Woodham as an area. Other parts of the borough have significantly stronger representation.

Woodham Lane has high pollution level and development would make the situation worse.

Why is the council not looking to build homes where new schools are being built which correspond with the other DPD allocation sites?

The loss of so many trees can not be justified, especially when the TPOs are strongly enforced on existing trees.

Development should be focused away from the SPA which is an area that the whole borough enjoys.

**Officer Response:**

Objection to the proposed allocation of the site is noted.

The overriding objective of the Martyrs Lane consultation is to make sure that any land that is safeguarded for future development needs is the most sustainable when compared against other reasonable alternatives. In making this decision, the Council will fully consider all representations received as part of the consultation process as well as the Council's evidence base documents including the Sustainability Appraisal. The sites proximity to the Horsell Common Thames Basin Heaths Special Protection Area is noted. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

The social and environmental implications of any proposed development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the development management stage. In addition, the traffic implications of the proposal as well as the cumulative effect of development within the wider area will also be taken into consideration. This has been addressed in further detail in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Whilst the recent ward boundary changes have not been to the satisfaction of all local residents in this particular area, it should be noted that the spatial distribution of development is driven by sustainability and not by ward boundaries. It is also important to highlight that the decision to consult on the possibility of safeguarding the land to the east of Martyrs Lane was made by a vote of Full Council. All Members will again have the opportunity to consider the representations to this consultation when deciding which overall strategy they wish to publish for Regulation 19 consultation and to submit to the Secretary of State for examination.

Regarding the representation on air pollution, the forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

As set out above, the Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently the Site

Allocations DPD are managed to help achieve sustainable development. Therefore the Council will only safeguard the site if it is felt to be the most sustainable when compared against the other reasonable alternatives. As part of the Sustainability Appraisal process, the Council has considered the proximity of all sites to local services and facilities. This includes walking times to both primary and secondary schools.

The representation regarding trees has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 01301/1/001  
**Customer Name:** Mr Stuart Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01302/1/001  
**Customer Name:** Ms Colette Sleat

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01303/1/001  
**Customer Name:** Mr Paul Watson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01304/1/001  
**Customer Name:** Ms Kate Browne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01305/1/001  
**Customer Name:** Ms Clare Postma

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01306/1/001

**Customer Name:** John

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01307/1/001  
**Customer Name:** Mr Johan Postma

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01180/1/001  
**Customer Name:** Mr Richard Phillips

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01181/1/001

**Customer Name:** Ms Vera Wall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01182/1/001  
**Customer Name:** Ms Jean Phillips

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01183/1/001

**Customer Name:** Mr H Castell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01184/1/001  
**Customer Name:** Ms Julie Dimes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01185/1/001

**Customer Name:** Les

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01186/1/001

**Customer Name:** M England

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01187/1/001  
**Customer Name:** Ms Anne Winfield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01188/1/001

**Customer Name:** Will

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01189/1/001  
**Customer Name:** Mr Thomas Ward

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01190/1/001  
**Customer Name:** Ms Carolyn Antel

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01193/1/001  
**Customer Name:** Ms Carol Norman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01194/1/001  
**Customer Name:** Mr Michael Kane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01195/1/001  
**Customer Name:** Mr Graham Fidler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01196/1/001

**Customer Name:** F Yakas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01197/1/001

**Customer Name:** E Keirnan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01198/1/001  
**Customer Name:** Mr David Burke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01199/1/001  
**Customer Name:** Mr Derek Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01295/1/001

**Customer Name:** Mr And Mrs J Kibble

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01296/1/001  
**Customer Name:** Ms Amanda Kelly

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01297/1/001  
**Customer Name:** Mr Peter Brodribb

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01298/1/001

**Customer Name:** Ms Charlotte Morris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01299/1/001  
**Customer Name:** Mr Chris Gates

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01309/1/001  
**Customer Name:** Ms Jennifer Knight

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01255/1/001  
**Customer Name:** Mr Tom Wood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01256/2/001  
**Customer Name:** Ms Linda Clarke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01257/1/001

**Customer Name:** J Sales

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01258/1/001

**Customer Name:** N Apthorp

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01259/1/001

**Customer Name:** S Stevenson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01260/1/001

**Customer Name:** G Stevenson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01261/1/001  
**Customer Name:** Mr Stephen Sutton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01262/1/001

**Customer Name:** Betty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01263/1/001

**Customer Name:** E Hopgood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00388/2/001  
**Customer Name:** Mr Paul Dinmore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01239/1/001

**Customer Name:** Remy Wong

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01240/1/001

**Customer Name:** N Critche

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01241/1/001

**Customer Name:** M Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01242/1/001  
**Customer Name:** Mr Andrew Griffiths

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01243/1/001  
**Customer Name:** E De Montfort

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01244/1/001

**Customer Name:** E Beddoe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01245/1/001

**Customer Name:** Mrs N Warren

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01246/1/001  
**Customer Name:** Mr John Gower

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01291/1/001  
**Customer Name:** Mr Graham Murray

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes and the necessary social and community infrastructure needed to support it without encroaching onto the golf course.

It is easier to create additional infrastructure than overloading existing over-stretched facilities.

It would simplify the process for obtaining planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals. The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

A Traveller site on the site would satisfy the requirements of policy CS14. It would also link in with other broader strategies in place in the most appropriate way. Pitches could be designed with the recommended privacy, security and space provisions, whilst the overall residential development could provide open-space and playground facilities. Traveller accommodation within the residential development would enable residents to seek or retain employment, attend school or other education and obtain access to health and shopping facilities.

**Officer Response:**

Support for the Martyrs Lane site is noted.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);

- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

**Contributor Reference:** 02676/1/001  
**Customer Name:** Mrs Christine E Curtis

**Summary of representation:**

Supports the Pyrford Village Society in supporting the proposal, in favour of Green Belt areas in Pyrford.

**Officer Response:**

Support noted

**Contributor Reference:** 01264/1/001

**Customer Name:** Drummond

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01265/1/001  
**Customer Name:** Ms Elizabeth Busby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01266/1/001

**Customer Name:** S Fowle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01267/1/001  
**Customer Name:** J R Dowdeswell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01268/1/001  
**Customer Name:** Ms Karen James

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01269/1/001  
**Customer Name:** Mr And Mrs Cecil Duguid

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01270/1/001  
**Customer Name:** Ms Beckie Johnson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00644/2/001  
**Customer Name:** Ms Amy Lambkin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01247/1/001

**Customer Name:** Nicky O'Shea

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01272/1/001  
**Customer Name:** Edel Govinden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01274/1/001  
**Customer Name:** Ms Tina Worsfold

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01273/1/001  
**Customer Name:** Ms Emily Govinden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01275/1/001  
**Customer Name:** Mr John Mould

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01276/1/001  
**Customer Name:** Ms Emma Wade

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00039/2/001  
**Customer Name:** Ms Vicki Morganti

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00068/2/001

**Customer Name:** Sam Doherty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01277/1/001  
**Customer Name:** Davon Pointer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01278/1/001  
**Customer Name:** Ms Celia Litchfield-Dunn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01248/1/001  
**Customer Name:** Ms Beryl Grout

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01271/2/001  
**Customer Name:** Cllr Beryl Hunwicks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01222/1/001  
**Customer Name:** Ms Cathy Sandsund

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01223/1/001  
**Customer Name:** Mr Paul Austin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01224/1/001  
**Customer Name:** Ms Janet Ayers

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01225/1/001

**Customer Name:** Yonah Acosta

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01226/1/001  
**Customer Name:** Ms Val Mattingley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01227/1/001

**Customer Name:** M Barber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01228/1/001

**Customer Name:** Kerry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01229/1/001  
**Customer Name:** Ms Philippa Park

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01230/1/001

**Customer Name:** E Dault

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01231/1/001  
**Customer Name:** Mr Thomas Webb

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01232/1/001

**Customer Name:** M Ogg Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01233/1/001

**Customer Name:** Anthony

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01234/1/001

**Customer Name:** C Schulten

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01235/1/001

**Customer Name:** Mrs Schulten

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01236/1/001

**Customer Name:** Nixon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01237/1/001  
**Customer Name:** Ms Pamela Witze

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01238/1/001

**Customer Name:** M Dymond

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01277/2/001  
**Customer Name:** Davon Pointer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01278/2/001  
**Customer Name:** Ms Celia Litchfield-Dunn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01279/1/001  
**Customer Name:** Mr Dave Hickey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01280/1/001

**Customer Name:** Jit Panesar

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01281/1/001  
**Customer Name:** Ms Hayley Jakubait

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01282/1/001  
**Customer Name:** Ms Kate Ripley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01283/1/001  
**Customer Name:** Ms Esther Ragnoli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01284/1/001  
**Customer Name:** Mr Maurice Buckingham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01285/1/001  
**Customer Name:** Mr Peter Grout

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01286/1/001  
**Customer Name:** Mr Jerry Ngwen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00218/2/001  
**Customer Name:** Ms Marisa Baker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01287/1/001  
**Customer Name:** Ms Hannah Searle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01288/1/001

**Customer Name:** Sophie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01289/1/001  
**Customer Name:** Ms Shan Hughes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01290/1/001  
**Customer Name:** Mr Elwyn Trevor Busby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01292/1/001  
**Customer Name:** Mr Andrew Love

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01293/1/001  
**Customer Name:** Mrs Sharon Fidler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01294/1/001  
**Customer Name:** Dr Heike Luecke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01514/1/001  
**Customer Name:** Ms Heather Lane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01249/1/001  
**Customer Name:** Mr Brian Marchant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01250/1/001  
**Customer Name:** Ms Donna Perdue

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01251/1/001  
**Customer Name:** Mr Ivor Canavan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01252/1/001

**Customer Name:** Mr Jason Park

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01253/1/001  
**Customer Name:** M Homampour

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01254/1/001  
**Customer Name:** Ms Nancy Eales

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01207/1/001

**Customer Name:** Ivan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01208/1/001

**Customer Name:** Kathy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01209/1/001

**Customer Name:** Alex

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01211/1/001  
**Customer Name:** Ms Colleen Costa

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01212/1/001  
**Customer Name:** Mr Matt Newman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01213/1/001

**Customer Name:** Ray

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01214/1/001  
**Customer Name:** Ms Francesca O'Driscoll

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01215/1/001  
**Customer Name:** Ms Kate Craddock

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01216/1/001  
**Customer Name:** Ms Diane Friend

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01217/1/001

**Customer Name:** Mr Webster

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01218/1/001  
**Customer Name:** Mr Paul Borrett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01219/1/001

**Customer Name:** Dave

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01220/1/001

**Customer Name:** Mehran

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01139/1/001

**Customer Name:** A Le Blanc

**Summary of representation:**

Besides a site in Mayford all development that is being proposed is in the north of the Borough. Areas like Knaphill have not been considered.

The road network in the area is not adequate to support a large number of additional vehicles.

Would like confirmation that the number of properties proposed will be sufficient to sustain the requirement for affordable and or social housing.

**Officer Response:**

As set out in the Regulation 18 consultation Issues and Matters Topic Paper, the Council has carried out a Sustainability Appraisal to appraise reasonable alternative sites to inform the Site Allocations DPD. This process is objective led and has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. The report is available to view on the Council's website.

In total, the Council appraised about 125 alternative sites when it was preparing the draft Site Allocations DPD. It should also be noted that the draft Site Allocations DPD contains over 70 sites that are located across the borough for a range of development uses.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to all residential development allocations in the Site Allocations DPD. Based on the Council's viability assessments used to inform the Core Strategy and Community Infrastructure Levy, residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability.

**Contributor Reference:** 01140/1/001  
**Customer Name:** Ms Joy Rogerson

**Summary of representation:**

Assumes that the reason for the Martyrs Lane consultation is to build over three times the number of houses.

Some of the original sites already suffer from gridlock and development will make the situation worse. This would imply that the sites are unsuitable. 3500 dwellings at Martyrs Lane would also create traffic problems.

Objects in principle to Green Belt development, which is immaterial to this consultation.

**Officer Response:**

The purpose of the consultation is to inform the Council's decision on its preferred safeguarding approach. As clearly set out in the Land to the east of Martyrs Lane Consultation Document, the site is considered to be able to accommodate at least 1200 net additional dwellings. Therefore the representation referring to 3500 dwellings is incorrect.

The Council has previously addressed the comments relating to traffic and road infrastructure for the six safeguarded sites identified in the draft Site Allocations DPD (2015) in the Regulation 18 consultation Issues and Matters Topic Paper. This is available to view on the Council's website.

Objection to the principle of Green Belt development is noted. The Council's response to this is also set out in the Regulation 18 consultation Issues and Matters Topic Paper.

**Contributor Reference:** 01141/1/001  
**Customer Name:** Mr Adam Gibson

**Summary of representation:**

Objects to the proposal

**Officer Response:**

Objection noted

**Contributor Reference:** 01142/1/001  
**Customer Name:** Mr David Ashdown

**Summary of representation:**

Objects to the proposal for the following reasons.

Loss of Green Belt land

Disruption caused during construction

Increased traffic congestion on roads unable to support additional traffic

Pressure on education and healthcare facilities already at capacity

Pressure on utilities and infrastructure including energy, drainage and waste disposal

**Officer Response:**

Objection to the proposed safeguarding of the site is noted.

The Council is fully committed to the comprehensive delivery of the Core Strategy which seeks to facilitate the delivery of at least 4964 net additional dwellings over the plan period. The Core Strategy also commits the Council to prepare the Site Allocations DPD to release Green Belt land for development, and in doing so make sure that it will not undermine its overall purpose and integrity. The reasons for Green Belt release to meet development needs is set out in further detail in the Regulation 18 consultation Issues and Matters Topic Paper as well as the Core Strategy.

It is correct that there will be some disruption during the construction period of any of the allocated sites, particularly where a number of the sites are in close proximity to each other. Nevertheless this will be taken into account at the planning application stage in order to minimise the disruption including noise, dust, traffic and air pollution. This may be controlled by planning condition to reduce or mitigate any adverse impacts of construction.

The representation regarding congestion on the local road network and the provision of additional infrastructure have been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

As part of the preparation of the Core Strategy and Site Allocations DPD, the Council has consulted with a wide range of infrastructure and utility providers to ensure that the adequate provision of infrastructure is delivered to support development. The Council will consider all of the representations received from these infrastructure providers and take them into account when finalising the Site Allocations DPD for Regulation 19 consultation. The Council is also in the process of updating its Infrastructure Delivery Plan and has a Community Infrastructure Levy Charging Schedule in place to secure infrastructure contributions from developments.

**Contributor Reference:** 01143/1/001  
**Customer Name:** Mr Richard Deacon

**Summary of representation:**

Support for the proposed safeguarding of the site.

The site is capable of accommodating associated infrastructure with new housing, either through new or enhancing existing. Understands that the A320 has emerged top of a list of transport improvements identified by the Local Enterprise Partnership for the 'M3 Corridor' (rated on a benefit–cost ratio).

**Officer Response:**

Support for the site is noted.

Regarding the representation on infrastructure provision, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has prepared a number of transport studies to support the Site Allocations DPD. These include the Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015) and the Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016). These studies highlight that the A320 is a traffic hotspot and development at Martyrs Lane or the six other sites will exacerbate congestion on this road as well as the A245 and B382. The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts and has also brought this to the attention of the LEP. Improvements to the A320 are also set out in the Council's CIL 123 List. This work is on–going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 01192/1/001  
**Customer Name:** Ms Suzanne Harding

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01157/1/001  
**Customer Name:** Ms Angela Cassidy

**Summary of representation:**

The site is previously developed land so does not perform any critical Green Belt purposes.

The site is more suitable for delivering affordable housing and is close to major employers.

Only the northern section of the site is needed to deliver the housing requirements. The New Zealand Golf Course should remain.

The site is more directly connected to rail and road networks. It would alleviate the congestion likely in West Byfleet from traffic emanating from the six alternative sites across the borough. It is adjacent to the A320 so traffic will travel away from the borough towards the M25 or A3. The A245 through West Byfleet is at capacity, especially when the development of Broadoaks and West Hall is considered.

Buses can be more easily provided to one site than several dispersed sites.

The Pyrford sites are used for recreational purposes and therefore has more amenity value.

The Pyrford sites are important heritage features of the wider landscape character as set out in The Surrey Landscape Character Assessment. Martyrs Lane has no known heritage value and limited public footpaths. It is not an integral feature of local designated heritage sites referred to in the Hankinson Duckett report.

Martyrs Lane has no local or national landscape designations where as Mayford and Pyrford are protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance'.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council notes the representation outlining reasons against safeguarding land for future development needs in Pyrford. This will be taken into account to inform the preferred approach to safeguarding.

Nevertheless neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust

policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The matters relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

**Contributor Reference:** 01191/1/001  
**Customer Name:** Mr David Thompson

**Summary of representation:**

Agree to the proposed allocation of safeguarding land to the east of Martyrs Lane for future development needs.

Although Green Belt, some of Martyrs Lane is previously developed land which is not true of the other proposed sites. It is not necessary to develop on the New Zealand Golf Course. The northern part of the site can deliver 1024 homes as required by the Local Plan.

The Green Belt in Pyrford is used for recreational purposes.

The Green Belt in Pyrford is an integral part of the heritage setting of the area. The sites are surrounded by heritage assets and features.

The Pyrford landscape is protected by Woking Core Strategy policy CS24 as an 'escarpment and rising ground of landscape importance'.

The Green Belt in Pyrford has been farmed and is good quality agricultural land. They are an important contribution to the rural character of the area and setting for the southern gateway into the town.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would

only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council notes the representation outlining reasons against safeguarding land for future development needs in Pyrford. This will be taken into account to inform the preferred approach to safeguarding.

Nevertheless neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

In addition, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

The representations relating to heritage, local character and amenity have also been addressed in the Regulation 18 consultation Issues and Matters Topic Paper, which is available on the Council's website.

**Contributor Reference:** 01210/2/001  
**Customer Name:** Mr Matthew Brown

**Summary of representation:**

The representation understands that the fields on either side of Upshot Lane, Pyrford are once again under threat from potential development as Woking Borough Council considers alternatives to the proposed development at Martyrs Lane.

The representation would like to stress the unique value of these fields as one of the very few remaining examples of virgin agricultural land still existing within the borough of Woking, providing both vital biodiversity and much appreciated green space in what is, unfortunately, becoming an increasingly urbanised region. Once lost, these natural assets will never be replaced, and will inevitably be the poorer for it.

The semi-rural setting of Pyrford was an important consideration to live in Pyrford.

Furthermore, in practical terms, our roads, many of which are very narrow and high traffic, could not cope with the addition of several hundred daily car journeys which development of this site would likely entail.

**Officer Response:**

The Council notes the representation outlining reasons against safeguarding land for future development needs in Pyrford. This will be taken into account to inform the preferred approach to safeguarding.

The representations regarding landscape character, biodiversity and traffic and congestion in Pyrford have been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper.

In addition, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. These sites are not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production it should be noted that this particular site is of low soil quality.

**Contributor Reference:** 01179/1/001  
**Customer Name:** Ms Alison Allana

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01200/1/001  
**Customer Name:** Ms Denise Stacey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01201/1/001  
**Customer Name:** Ms Hazel Nelson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01202/1/001  
**Customer Name:** Colonel RES Stuart Vasey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01203/1/001  
**Customer Name:** Ms Christine Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01204/1/001

**Customer Name:** Kevin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01205/1/001  
**Customer Name:** Mr Brian Hamill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01206/1/001  
**Customer Name:** Ms Eileen Pope

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01170/1/001  
**Customer Name:** Ms Laurretta Summerscales

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01171/1/001

**Customer Name:** Nat Meeajun

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01172/1/001

**Customer Name:** D Sharples

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01173/1/001

**Customer Name:** Gill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01174/1/001  
**Customer Name:** Mr Paul Robinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01175/1/001  
**Customer Name:** Mr Julien Barnes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01176/1/001  
**Customer Name:** Mr Jonathan Jaques

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01177/1/001  
**Customer Name:** Mr John Woolgar

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01221/1/001  
**Customer Name:** Ms Michelle Hollas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01138/1/001  
**Customer Name:** Ms Anna Haynes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01144/1/001  
**Customer Name:** Mr Derek Lynch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01145/1/001  
**Customer Name:** Ms Judi Howell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01146/1/001  
**Customer Name:** Charley Howell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01147/1/001  
**Customer Name:** Mr John Bryant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01148/1/001  
**Customer Name:** Ms Isabelle Magnet

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01149/1/001  
**Customer Name:** Ms Linda Thatcher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01150/1/001  
**Customer Name:** Ms Linda Goodey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01151/1/001  
**Customer Name:** Ms Christine Wells

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01152/1/001

**Customer Name:** M Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01153/1/001  
**Customer Name:** Mr Simon Phipps

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01154/1/001  
**Customer Name:** Ms Pam Bryant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01155/1/001  
**Customer Name:** Mr Graham Wilmot

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01156/1/001

**Customer Name:** J A Schofield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01158/1/001  
**Customer Name:** Ms Teresa Harrison

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01159/1/001  
**Customer Name:** Mrs J Free-Gore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01160/1/001

**Customer Name:** Mr Peter Hill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01161/1/001  
**Customer Name:** Mrs Jackie Grant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01162/1/001  
**Customer Name:** Mr Allen Dean

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01163/1/001  
**Customer Name:** Mr And Mrs D Eastwood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01164/1/001

**Customer Name:** Mr And Mrs Michael And Jane Franklin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01165/1/001  
**Customer Name:** Ms Melanie Hodkisson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01166/1/001  
**Customer Name:** Ms Felicity Jells

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01167/1/001

**Customer Name:** Mr Christian Luecke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01168/1/001

**Customer Name:** M Skilton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01169/1/001  
**Customer Name:** Ms Marrie Claire Hawke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01178/1/001

**Customer Name:** Tracey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01102/1/001  
**Customer Name:** Mr James Maden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01105/1/001

**Customer Name:** M Wheeler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01106/1/001  
**Customer Name:** Ms Linda Newman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01107/1/001  
**Customer Name:** Mr Joseph Assheton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01108/1/001  
**Customer Name:** Ms Gemma Sergant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01109/1/001  
**Customer Name:** Ms Nicola Marinaro

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01110/1/001

**Customer Name:** Ms Jan Roake

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01111/1/001

**Customer Name:** Mr David Sma

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01112/1/001  
**Customer Name:** Ms Angela Strev

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01113/1/001

**Customer Name:** Mr A Strev

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01115/1/001  
**Customer Name:** Mr Ben Montila

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01116/1/001  
**Customer Name:** Mr Nigel Rutland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01117/1/001  
**Customer Name:** Ms Beryl Rutland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01118/1/001

**Customer Name:** Mr Tim Write

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01119/1/001  
**Customer Name:** Ms Sarah Myles

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01120/1/001  
**Customer Name:** Mr Andrew Liven

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01121/1/001  
**Customer Name:** Mr Neil Bateman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01122/1/001  
**Customer Name:** Mr Mark Clements

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01123/1/001  
**Customer Name:** Mr Graham Barclay

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01124/1/001  
**Customer Name:** Ms Mandy Ferguson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01125/1/001  
**Customer Name:** Mr Graeme Corbett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01126/1/001  
**Customer Name:** Mr Nick Riches

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01031/1/001  
**Customer Name:** Mr Anthony Dodge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01032/1/001  
**Customer Name:** Mr Jon Litchfield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01033/1/001  
**Customer Name:** Dr David Crees

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01034/1/001  
**Customer Name:** Ms Diane Atkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01035/1/001  
**Customer Name:** Mr Craig Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01036/1/001  
**Customer Name:** Dr Manvinder Virdee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01037/1/001  
**Customer Name:** Mr Peter Warwick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01038/1/001  
**Customer Name:** Mr Greg Tallent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01039/1/001

**Customer Name:** Mr L E Hyde

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01040/1/001  
**Customer Name:** Mr Melvyn Dunstall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01041/1/001  
**Customer Name:** Ms Sarah Dunstall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01042/1/001  
**Customer Name:** Ms Denise Cassar

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01043/1/001  
**Customer Name:** Ms Amanda Long

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01044/1/001  
**Customer Name:** Mr David Flitcroft

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01045/1/001

**Customer Name:** Mr Colin Lee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01047/1/001

**Customer Name:** Ms Nicola Fernandez

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01048/1/001  
**Customer Name:** Mr Steve Jenkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01049/1/001  
**Customer Name:** Ms Gabriel Sore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01050/1/001

**Customer Name:** Mr Monst

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01051/1/001  
**Customer Name:** Mr Rob Schifano

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01052/1/001

**Customer Name:** T Elfyn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01053/1/001

**Customer Name:** Ms Geraldine O'Farrell-Wallum

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01054/1/001  
**Customer Name:** Mr Piers Capper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01055/1/001  
**Customer Name:** Ms Melanie Capper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01057/1/001  
**Customer Name:** Ms Ella Warwick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01060/1/001  
**Customer Name:** Mrs J S Warrington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01061/1/001  
**Customer Name:** Ms Sarah Jakubait

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01062/1/001  
**Customer Name:** Ms Katrina Clements

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01046/1/001  
**Customer Name:** Ms Liza Fiddes

**Summary of representation:**

Understands that the South East needs more accommodation, but this area is oversubscribed with people. Woodham Lane is a busy road at the best of times, and when there are issues with the A320 it becomes the alternate route; the bumps near the Broadway are not built to cope with HGVs constantly.

The current works on Victoria Way are showing how the area is unable to cope with roadworks; if more houses are added to the area the issue will only become worse.

Both the A320 and Martyrs Lane have had some serious accidents – these would only increase and make the junctions with McLaren and Woodham Lane even more dangerous.

We are also very lucky in our area to have some unusual species such as the Dartford Warbler at Chobham Common; and there are probably similar unusual species in this area that shouldn't be pushed towards extinction due to extra houses.

People are unlikely to want to live next to a tip due to the smell.

**Officer Response:**

Objections are noted.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites, and that highway safety is maintained. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The Council recognise that the land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

The Council accepts that it has not carried out a detailed ecological assessment of the site, and recognises the importance for doing so. However, the appropriate time to undertake such a

study would be at the development management stage. The land will only be released for development as part of the review of the Core Strategy and or the Site Allocations DPD, and that will be the most appropriate time to set out the key requirements for any development to be acceptable.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The social and environmental implications of the recycling centre will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

**Contributor Reference:** 01056/1/001

**Customer Name:** Glenn Sawyer

**Summary of representation:**

From a purely commercial point of view a single site is more economical.

The Green Belt should be protected no matter what. Appreciate that previously developed land is in short supply, but Green Belt land should not be utilised, due to the important purpose of the Green Belt.

Since the Green Belt was established, several areas have merged and urban sprawl has taken place in areas in and around Woking e.g. Westfield and Old Woking, Knaphill and Horsell. There are very few outlying villages that have not yet been absorbed into the whole, and the Core Strategy only identifies the villages of Mayford and Brookwood as remaining. However, were the Martyrs Lane site to be utilised it would not merge villages since it would only border both Sheerwater and to a lesser extent Woodham. These villages are already joined and separated only by postcode. Whereas were GB10 and GB11 (Sanders Lane, Mayford) to be developed it would effectively infill and merge Mayford with Hook Heath, GB4 create an infilling of Byfleet, GB5 an expansion of Byfleet, GB12 create an infilling of Pyrford and GB13 an expansion to Pyrford.

Amenity is a key consideration, and Martyrs Lane site has the potential to deliver this over and above the substituted sites as follows:

- i) Martyrs Lane benefits from existing direct access onto the A320 and A245 road transport links and with easy access to the M25, whereas the 6 other identified sites in and around the south of Woking will directly access either onto country lanes, in-town roads or filter onto B roads. The only exception being GB4 could access the A245. All of these road networks are already exceptionally busy.
- ii) A single site will mean less overstretching of existing key infrastructure services such as electricity, gas, water and telecoms as a scheme of this size is likely to necessitate national grid changes, and given that additional essential services such as health facilities, community centres etc could be built-in to the scheme (provided perhaps by the developers) then overall development costs are reduced.
- iii) Provision of affordable homes, social and Traveller accommodation – a larger, single site provides greater opportunity and flexibility. A development of this scale could include 1–2 bedroom dwellings and not just 3–4 bedroom dwellings.
- iv) Given that the Martyrs Lane site scheme would need to respect the Borne river flood plain it is unlikely to have any other detrimental effect on the surrounding water table, whereas relating to GB10 and GB11 any development on the Hook Heath escarpment will have significant effect on the area below and ultimately would affect the flood zone in and around the Hoe stream and surrounding heathland and SSSI, even given the implementation of an effective surface water attenuation scheme.
- v) Fewer existing residents of the Borough would be directly affected if a single site was included in the Site Allocations DPD over and above the six individual sites detailed.

## Officer Response:

The merits of the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

A key objective of the Council – and of the Core Strategy – is to protect the integrity of the Green Belt and to harness its recreational benefits for the community. As acknowledged in the representation, the Council will direct most new development to previously developed land in the town, district and local centres. However, in order to meet future housing need in the Borough, the Council has identified areas of Green Belt which are of lower quality, or serve less purpose, to meet housing need beyond 2022. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. This issue is addressed in detail in the Regulation 18 Issues and Matters Topic Paper (see Section 1 and 2).

The Council has commissioned two studies to assess various parcels of land against the purposes of the Green Belt as defined in the NPPF:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt. The Peter Brett report does, however, recommend the original sites to be allocated for development: further detail can be found in the conclusions of the report, and in the

Regulation 18 Issues and Matters Topic Paper (see specifically Section 12 on the separation between Woking and Mayford; Section 15 on urban sprawl; and Section 21 on removing Green Belt land and affect on amenity of residents).

With regard to transport: the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed

transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

With regard to infrastructure: to ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

With regard to housing mix and Traveller accommodation: the Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other. The Council will also ensure that a satisfactory housing mix is delivered – as required by Core Strategy planning policy (currently CS11) – irrespective of whether development is on a single or multiple sites.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers as set out in the Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

With regard to flood risk: the Council attaches significant importance to flood risk because of its potential threat to the livelihood of residents and local businesses. The Site Allocations DPD is informed by an up-to-date Strategic Flood Risk Assessment (2015) which determined the suitability of sites according to their exposure to flood risk. Section 5 of the Regulation 18 Issues and Matters Topic Paper provides more detail, and concludes that the development of the original six sites would not lead to or be exposed to an unacceptable level of flood risk.

Whilst there may be economies of scale related to the development of a single site, a key objective of the Site Allocations DPD is to allocate the most sustainable sites given all reasonable alternatives, whilst making sure that the overall purpose and integrity of the Green Belt are not undermined. There are planning policy mechanisms in place to ensure that development is supported by the necessary social, physical and green infrastructure irrespective of whether a single site or multiple sites are allocated for development. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

**Contributor Reference:** 02969/1/001  
**Customer Name:** Mr Tony Howe

**Summary of representation:**

The site to the east of Martyr's Lane does not contain any currently – defined Areas of High Archaeological Potential, County Sites of Archaeological Importance or Scheduled Monuments. It does however include a number of entries on the County Historic Environment Record, and some Ancient Woodland. The site is also extremely large – well over the 0.4ha threshold specified in the Woking Local Plan (Core Strategy Policy CS20) as necessitating archaeological assessment and possibly evaluation prior to development. Even if the site is developed as a series of smaller parcels over a longer period of time, threshold is expected to be relevant for the majority of the area.

Recommends that a minimum requirement for archaeological assessment should be included in any development document or outline that might be produced for the site to inform potential developers of possible site constraints.

The sites that are proposed to be removed from the DPD also contain a number of identified archaeological constraints which require similar assessment to that set out above. Has no concerns about these being removed from the DPD should the site at Martyr's Lane be substituted, or their remaining in the DPD if it is not.

These comments are made from the archaeological point of view and should not be interpreted as either endorsement or opposition to the proposal or represent any other perspective.

**Officer Response:**

The Council is aware of the existing designated Ancient Woodland towards the northern end of the land. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees. This is highlighted in the Housing White Paper. This particular Ancient Woodland is designated on the Council Proposals Map for protection. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that heritage assets are protected as part of any future development. Particular reference is made to Policies CS20: Heritage and conservation, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM20: Heritage assets and their settings of the Development Management Policies DPD.

Safeguarded sites for development after 2027 will only be released for development through the review of either the Core Strategy and/or the Site Allocations DPD. At this point, the key

requirements of the site(s) – including the requirement to conduct appropriate archaeological evaluation and investigation – will be included in planning policy within the DPD. The recommendations within the representation are, however, noted and will be taken into account in future iterations of the DPDs. It is highly likely that similar planning policy to that referred to above will apply to the safeguarded sites with regards to heritage assets, and therefore it is likely that conducting archaeological assessment will be included.

**Contributor Reference:** 01059/1/001  
**Customer Name:** UK Power Networks

**Summary of representation:**

A map is attached of UK Power Networks' assets within the area at land to the east of Martyrs Lane, which would need to be protected/considered during any planning application for development at this site.

**Officer Response:**

The presence of UK Power Networks' infrastructure assets is noted, and will be considered as part of any future planning application that is submitted should the site be safeguarded for development.

**Contributor Reference:** 00197/3/001  
**Customer Name:** Ms Marianne Meinke

**Summary of representation:**

Attached is a list of traffic accidents in and around the Lion Retail Park area to demonstrate how building more homes on this already congested side of town will threaten highway safety and endanger local residents.

**Officer Response:**

The additional evidence is noted. The issues put forward in this representation have been addressed in full against the original consultation response, reference: 00197/2/001.

**Contributor Reference:** 01073/1/001  
**Customer Name:** Mr Ken Simpson

### **Summary of representation:**

Opposed to the proposal (and also to the building of homes on previously identified sites in the Green Belt).

No new housing should be built within 400m of the Thames Basin Heaths SPA. A significant percentage of the proposed development site falls within this zone. Consultation of the South East Plan revealed that potentially damaging levels of recreational pressure are already faced by many European sites. Recreational use of a site has the potential to cause disturbance to sensitive species, cause damage through erosion, and generate problems with dog fouling. Bird species are more affected by people with dogs than by people alone. Horsell Common is already used by a large number of dog walkers. Many hundreds of new homes within half a mile would add significantly to this problem. Nutrient-rich habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces.

Within 400m–5km of the SPA boundary, the Thames Basin Heaths Avoidance Strategy requires development to make a contribution towards the provision of SANG and SAMM to mitigate adverse impacts on the SPA. This alone rules out the Martyrs Lane site for development. The provision of SANG as a mitigation measure is nonsense: if the occupants of a thousand new homes have Horsell Common SPA on their doorstep it is inevitable that a significant number of those people will use that land for leisure purposes, many of them dog walkers. Any SANG land cannot be provided within the Borough closer than Horsell Common. The availability of SANG is recognised by WBC as a fundamental constraint, and they have confirmed that any site which cannot be apportioned to a particular SANG, or provide a bespoke SANG, will not be allocated.

A massive increase in motor vehicle use within a small area, which is what the Martyrs Lane development would inevitably bring with it, would contribute to atmospheric pollution. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious effect on the quality of nitrogen-limited terrestrial habitats, such as Horsell Common.

The Sustainability Appraisal is unnecessarily extensive, with little meaningful content. Queries the following:

- development cannot bring a positive impact on health – with fewer trees and greenery, more cars and pollution, more water extraction and more waste;
- why would public open space not be provided irrespective of whether new housing is built;
- designing in natural surveillance – what is this;
- provision of sustainable transport modes won't make any difference – people will use cars even for the shortest of journeys;

- does not regard the 'brownfield' parts of the site as any less valuable than the greenfield parts – house building on this area cannot be justified on the basis that it is previously development land – it still has landscape assets;
- tree surveys are meaningless;
- it is not guaranteed that habitat features and connections of biodiversity importance will be retained – just 'where possible';
- design and landscaping will not be sufficient to disguise the construction of hundreds of homes;
- how will sustainably produced and local products reduce the impact of consumption – will hundreds of trees be cut down to be used in the construction of houses? What locally sourced materials will developers be using?
- assets of value will be preserved – does this include trees?
- how would the design of the development be adapted to the impacts of climate change?

The site should not be considered given the findings of the Landscape Assessment and Green Belt review. There is a reference to creating durable boundaries to the north of the proposed site to mitigate perceived sprawl of urban area and future merging of towns; this site would make a nonsense of the Green Belt, which was established as a 'durable boundary'. By building on Green Belt land of course it's a significant step towards merging towns. In another fifty years the 'durable boundaries' will be shifted again to accommodate more housing.

The collective development of Fair Oaks Airport, the McLaren Technology Centre and the Martyrs Lane site would be unacceptable, surrounding Horsell Common with development. The SPA would become overused by the public.

Also opposed to the building of homes on previously identified sites. The problem is not a housing shortage – it is a national problem of overpopulation.

**Officer Response:**

The objections to the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

Policy CS8: Thames Basin Heaths Special Protection Areas (SPA) of the Core Strategy accords priority to the protection of the SPA. The policy provides a robust planning policy framework to make sure that no sites are allocated or granted planning permission for new residential development within 400m exclusion zone of the SPA. Were the Martyrs Lane site to be safeguarded, no residential development would be permitted within this zone. New residential development within the 400m–5km zone would be required to make a financial contribution towards the provision of SANG and SAMM. The policy allows bespoke SANGs to be secured if it is considered feasible and deliverable. The Council has identified sufficient SANG capacity through existing SANG sites and proposed allocations in the draft Site Allocations DPD to enable the delivery of the Core Strategy and beyond. The Council will engage with Natural England – who have been consulted during this exercise – to agree the nature and size of SANG that will be needed to serve this development if it is allocated. The Council will initiate

this discussion at the appropriate time. If sufficient SANG land could not be identified to serve the development at the Martyrs Lane site, the development would not meet the requirements of planning policy, which would be a material consideration in the assessment of any planning application. This would also be the case for the originally identified sites.

It is acknowledged that the site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to ensure that important wildlife features and landscape features are protected, including those surrounding development sites (which are likely to be in place in future iterations of the DPDs). Any planning application for development on this site would need to comply with these policies if it were to gain planning approval. In particular, policy CS7 Biodiversity and nature conservation, restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected. The Council's response to these comments can be accessed for further information.

The Sustainability Appraisal Report is a requirement of the Planning and Compulsory Purchase Act 2004. The SA Report also encompasses the requirements of the European Union Directive 2001/42/EC (SEA Directive). The Council appreciates that the SA Report is a lengthy document, but the aforementioned legislation and regulation prescribes the content and structure of an SA Report: it is fundamental to the preparation of the Site Allocations DPD to ensure its soundness at Examination.

Each site is assessed against the Sustainability Appraisal Framework. This SA Framework was informed by several earlier stages including the formulation of SA Objectives; the review of plans, programmes and strategies which are relevant to the Site Allocations DPD; analysing baseline information; analysing consultation responses on the content of the SA Framework; and including the requirements of the SEA Directive. The full SA Framework is available within the main SA Report at Table 5, and contains a series of 'decision-aiding questions' which provide further detail and the context within which the outcome of the individual site assessments were made. The assessment tables need to be read in conjunction with the SA Report in order to understand how each component of the SA Framework was designed, and to gain a greater understanding of the methodology for scoring. In particular, refer to Section 10 and 11, and to Appendix 1 which details which plans, programmes, policies and strategies fed into the SA Framework. For example, the decision-aiding questions under SA Objective 2 indicate how development can bring a positive impact on health by supporting the provision of key health services; and improving accessibility to leisure and open space for informal and/or formal recreation where these opportunities did not previously exist on the land. Objective 12 is to 'reduce the impact of consumption of resources by using sustainably produced and local products' – the decision-aiding questions in the SA Framework expand on the meaning of this objective, and on other objectives queried in the representation (such as how development can be designed to adapt to the impacts of climate change). Trees are considered an asset of value: the Council has recently adopted the Development Management Policies DPD, containing

policy DM2 Trees and landscaping, setting out detailed criteria for the protection of existing trees and landscaping with which development schemes must comply.

It should be noted that the SA Report is an integral part of the Site Allocations DPD process – which informs decisions about the sustainability and selection of all reasonable site allocation options – but it also forms part of a wider evidence base, and its recommendations are not considered in isolation.

The Council does not assume that development is justifiable on all previously developed land. Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. The site is being considered for future development due to a change in circumstances with the McLaren site after the draft Site Allocations DPD was published for Regulation 18 consultation (the planning conditions attached to the latest planning approval at the McLaren site ref: PLAN/2014/1297 led to a change in direction for McLaren, making the land available for consideration for future development). The Council wanted to ensure that all reasonable options had been assessed before coming to a decision about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination.

It is acknowledged that the conclusions of the Woking Green Belt review by Peter Brett Associates (2013) and the Landscape assessment and Green Belt review by Hankinson Duckett (2016) demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion to the Green Belt. However, it is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

Paragraph 1.10 of the Regulation 18 Issues and Matters Topic Paper explains why the Green Belt boundary is being reviewed. It also explains at paragraph 2.10 that evidence in the Green Belt boundary review report demonstrates clearly that beyond the sites being allocated and safeguarded in the DPD, no other sites can be identified in the Green Belt for development purposes without significant damage to its purpose and integrity. It is therefore unlikely that the Green Belt is repetitively reduced in future years, with further shifts in the boundary, to accommodate more housing.

At this stage, there has not been a detailed assessment to determine the cumulative impacts of development at Martyrs Lane, Fair Oaks and Longcross. However, under the Duty to Cooperate, Woking would take a positive initiative to call for partnership working to assess the cumulative impacts of the various developments with a view to identifying specific measures that could be implemented to address any adverse impacts on the strategic and local road network, and on the natural landscape and assets. The three authorities involved have already met to agree the way forward on partnership working to meet this objective.

**Contributor Reference:** 01074/1/001  
**Customer Name:** Ms Peggy Last

**Summary of representation:**

Support proposal. Consideration should be given to:

1. Some of the Green Belt land has been previously developed;
2. A single site of this scale would bring economies of scale in its development, and help resolve infrastructure concerns;
3. The A245 through West Byfleet and over the M25 bridge does, however, have little spare capacity.

**Officer Response:**

Support is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings, and some has been previously developed. However, the Council has assessed a wider parcel of land and carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies, is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include, in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors. Other sections of this Issues and Matters paper address some of these other factors in detail.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy (an example is the Infrastructure Delivery Plan which is available on the Council's website). The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites.

The Council is fully aware of local residents' concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The A245 has been identified in the transport assessment as a potential traffic hotspot. The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of

the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

**Contributor Reference:** 01114/1/001  
**Customer Name:** Mr Stephen Higham

**Summary of representation:**

The proposed site to the east of Martyrs Lane is not suitable for development for the following reasons:

1. The scale of the development would overload the local infrastructure and would cause large problems both for existing residents of the area and any new residents. The local roads can barely cope with the peak hour traffic as it is now so to add an extra 1500– 2500 vehicles to overcrowded roads would cause traffic problems each and every day, resulting in pollution and therefore impact on everyone. It would also impact on people passing through the area as the journey time would be increased.
2. It is not enough to consider public transport as a possible part solution as the location means that people using the railway would need transport to and from the station and local buses are inadequate.
3. The loss of green belt land would be detrimental to the air quality of the area with loss of green lungs by way of trees etc at the same time as increasing atmospheric pollution through traffic fumes and everyday living pollution.
4. There is already a loss of local habitat for wildlife and pressure on open spaces nearby such as Horsell Common, leading to litter, dog fouling and footpath degradation so to further increase pressure on this space would have an even greater negative impact.
5. There would need to be much greater provision of other local services for residents ie. primary schools, secondary schools, doctors surgeries etc. There is not sufficient space to provide all of these in the area so either more land would be taken or more journeys would need to be made.
6. The plan for Woking would be better served by the other smaller developments which can be integrated into the local area in a much easier way with less impact on each area.

**Officer Response:**

Objections are noted. The merits of developing six smaller sites rather than one larger, single site in terms of integration into the local area are noted, and will weigh in the balance of considerations by Members.

Traffic and infrastructure (including public transport provision) issues associated with the potential development of land to the east of Martyrs Lane are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. This includes the Council's response about public transport connectivity, and access to rail stations.

There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

The sites' proximity to the Horsell Common Thames Basin Heaths SPA and SSSI is noted. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy. The Response Topic Paper also provides a detailed response regarding the protection of wildlife.

**Contributor Reference:** 01136/1/001  
**Customer Name:** Mr Eric Mamet

**Summary of representation:**

Opposed to the proposal. The Green Belt land provides breathing space to the local community.

Local traffic is already a problem, and dangerous to cyclists.

The concentration of development on one, large site does not amount to sustainable development.

**Officer Response:**

Objections are noted. The Regulation 18 Consultations Issues and Matters Topic Paper sets out in detail the justification for releasing Green Belt land for future development, and how in doing so, it will not undermine its overall purpose and integrity (see Sections 1 and 2).

The Council is fully aware of local residents' concern about the existing traffic conditions on various transport routes and takes those concerns seriously. The outcome of a series of transport assessments conducted to quantify and forecast traffic impacts of developing the allocated sites have shown that existing levels of congestion, including on the A320, are likely to be exacerbated. The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites. The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The transport studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently of the Site Allocations DPD are managed to help achieve sustainable development. The outcome of the appraisal demonstrates that there are a number of negative, positive and neutral impacts for developing the site. The same Sustainability Appraisal Framework had been used to carry out a SA of the originally proposed six safeguarded sites. The SA Framework enables consistent information to be gathered to make comparative judgements between the sites. The Council therefore has significant information to inform decisions about the most sustainable site to safeguard for future development. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives.

**Contributor Reference:** 02678/1/001  
**Customer Name:** Ms Sarah Tucker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02679/1/001  
**Customer Name:** Mr Neville Ledsome

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01549/2/001

**Customer Name:** M Y Foat

**Summary of representation:**

The Woodham Court site should be taken into consideration for sustainable development. It is really brownfield, and it is disappointing to see that it is being ignored. Having to wait until 2027 is not helpful, when information relating to the site has been submitted years ago.

**Officer Response:**

Support for the site is noted.

Although part of the site has been developed, nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites identified for safeguarding. As shown on the proposal map, the site is within Green Belt and Green Belt policies apply.

As set out in Section 2.0 of the Regulation 18 consultation Issues and Matters Topic Paper, the Council, as part of the Site Allocations DPD process, is seeking to safeguard land for future development needs between 2027 and 2040. This is also explained in the Duty to Cooperate Bodies Topic Paper.

It should be noted that the site was comprehensively assessed as part of the Draft Site Allocation DPD. The site was ruled out in part because it would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the site would be too isolated to be a standalone development.

The availability of the land for development will help inform members decision on the Council's preferred safeguarding approach.

**Contributor Reference:** 02718/1/001

**Customer Name:** Woking Constituency Labour Party

**Summary of representation:**

Concerns with the proposal to replace the other six sites with one site at Martyrs Lane. Worried this is a number issue in relation to responses received and the impact on the residences in Woodham Lane will be no less.

Impact of the development on Martyrs Lane, the risk of overdevelopment of the site, congestion of the A320 and recycling facilities. Loss of amenity of the Golf Course and the impact of the Sheerwater development close by.

The consultations must take all sites into account.

**Officer Response:**

The Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The traffic implications for developing the site have been addressed above. Any detailed transport assessment will take into account background traffic generated by the existing uses on the site, including the recycling centre. Similarly, any measures of mitigation to address forecast traffic impacts will seek to address the cumulative traffic impacts generated from the entire land.

The social and environmental implications of the recycling centre will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the

amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 01127/1/001

**Customer Name:** J P M Duncan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01033/2/001  
**Customer Name:** Dr David Crees

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01128/1/001

**Customer Name:** C Walton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01129/1/001  
**Customer Name:** Mr Chris Loake

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01130/1/001  
**Customer Name:** Ms Lucy Allard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01131/1/001  
**Customer Name:** Ms Jane Hargreaves

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01132/1/001  
**Customer Name:** Mrs Hennessy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01133/1/001

**Customer Name:** Mr T Urwin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01134/1/001  
**Customer Name:** Ms Jan Rossouw

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01135/1/001  
**Customer Name:** Ms Alison Rutherford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01137/1/001  
**Customer Name:** Ms Janette Butler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01081/1/001

**Customer Name:** B Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01103/1/001  
**Customer Name:** Charlie Cripps

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01104/1/001  
**Customer Name:** Mr Garth Foote

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01063/1/001  
**Customer Name:** Ms Christine Allen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01064/1/001  
**Customer Name:** Ms Emma Saffin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01065/1/001  
**Customer Name:** Mr James McKie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01066/1/001  
**Customer Name:** Ms Victoria Sheerman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01067/1/001  
**Customer Name:** Dr Barry Maunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01068/1/001  
**Customer Name:** Dr Christine Maunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01069/1/001  
**Customer Name:** Mr Henry Arthur

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01070/1/001  
**Customer Name:** Mr Martin Wadds

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01071/1/001

**Customer Name:** Ms Jill Cater

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01072/1/001  
**Customer Name:** Ms Alison Wright

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01075/1/001  
**Customer Name:** Mr Ben Warwick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01076/1/001  
**Customer Name:** Vajahat Ahmad

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01077/1/001  
**Customer Name:** Mr Mark Symons

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01078/1/001

**Customer Name:** Ms Suzanne Brannan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01079/1/001

**Customer Name:** Mr Nick Wills

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01080/1/001  
**Customer Name:** Ms Marie Lynch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01082/1/001  
**Customer Name:** Mr Peter Holmes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01083/1/001  
**Customer Name:** Ms Floriano DaSilva

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01084/1/001

**Customer Name:** R Slevin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01085/1/001

**Customer Name:** A Fairlie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00534/1/001  
**Customer Name:** Mr Tim Hopkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01086/1/001

**Customer Name:** C Highbury

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01087/1/001  
**Customer Name:** Ms Bethan Lopez

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01088/1/001

**Customer Name:** S Newman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01089/1/001

**Customer Name:** M Barr

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01090/1/001  
**Customer Name:** Mr Mark Skerl

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01091/1/001

**Customer Name:** Ms Sharon Hickman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01093/1/001  
**Customer Name:** Ms Diana Healy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01092/1/001  
**Customer Name:** Ms Tracy Howells

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01094/1/001

**Customer Name:** M Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01095/1/001

**Customer Name:** Mr Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01096/1/001  
**Customer Name:** Ms Sylvia Shilvock

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01097/1/001

**Customer Name:** Ms Kim Bent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01098/1/001  
**Customer Name:** Mr Daniel Sturgeon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01099/1/001

**Customer Name:** Linbeth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01100/1/001

**Customer Name:** A Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01101/1/001  
**Customer Name:** Ms Sharin Brew

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01019/3/001  
**Customer Name:** Mr Matthew Pink

**Summary of representation:**

Woodham Lane is already a very busy road more houses will add to the strain on the roads Brooklands and Addlestone are gridlocked on a daily basis. Where does the extra capacity for schools and health services come from they are already underfunded and cannot cope now.

**Officer Response:**

The Council has addressed the representations on traffic and congestion as well as infrastructure provision in the Woodham and Horsell Neighbourhood Forum Issues and Matters Topic Paper.

**Contributor Reference:** 01030/1/001  
**Customer Name:** Ms Gaynor White

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00967/1/001  
**Customer Name:** Mr Robert Streeter

**Summary of representation:**

A key consideration is the impact on the road infrastructure, notably the A320 and A245 which are busy local and regional roads.

Development would require major improvements to these roads to manage additional capacity and ensure traffic flows. This will maintain journey times and limit pollution from standing traffic. Road widening is one possible solution and an impact assessment should be carried out by the Highways Authority.

Congestion negatively impacts residents through increased journey times and poor health. It also restricts access to local amenities and generally makes the area less attractive for new and existing business.

**Officer Response:**

The representation regarding highways has been noted. The Council has addressed the issues raised in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper. As set out in the topic paper, the Council is working in partnership with the County Highways Authority to identify hard and soft mitigation measures to minimise any development impacts, including those on traffic flows and air pollution. This partnership working will take place regardless of what site(s) the Council decides to safeguard for future development needs.

**Contributor Reference:** 00981 / 1 / 001  
**Customer Name:** Ms Jacquelyn Douch

**Summary of representation:**

Strongly object to the proposed Martyrs Lane allocation.

Such a large number of houses will have an adverse impact on the local road network with overloaded traffic and congestion. It shows a disregard to local residents.

The local area does not have the necessary infrastructure to support such a development with doctors and schools already at capacity.

Runnymede Borough Council is also considering development in Ottershaw and if all allocations are agreed then how is the area to cope with the increased population without the resources or road capacity.

Would personally be affected by the proposed safeguarding of the site.

The Guildford Road is already busy and there have been several fatalities in the past few years, and further development will make the road unsafe.

Consider this representation as an objection to the proposed safeguarding of this site.

**Officer Response:**

The Council has addressed the representation regarding the road network and the provision of infrastructure in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

As set out in the Topic Paper, under the Duty to Cooperate the Council is working with neighbouring authorities including Runnymede and Surrey Heath as well as the County Highways Authority to identify development impacts on the local road network. As part of this work, the Council will determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts.

**Contributor Reference:** 00973/1/001  
**Customer Name:** N C R Duffield

**Summary of representation:**

Concerned about the proposal to add 220 dwellings in Byfleet.  
Large areas of land are flood plains and this has been ignored in recent planning decisions.  
There are already traffic problems with the road network due to recent development and additional development will make the situation worse.  
Byfleet will be over developed with no supporting infrastructure such as healthcare facilities.  
Parvis Road is a main road link in the area and already is at capacity.  
The Council should focus development in the empty offices and houses. This will also increase Council Tax receipts.

**Officer Response:**

The Council notes the reasons against development in Byfleet. These matters have already been addressed by the Council during the Regulation 18 consultation. This can be found within the Regulation 18 consultation Issues and Matters Topic Paper which is on the Council's website.

In addition, the Council's Infrastructure Delivery Plan notes that at present there is adequate GP provision to meet overall demand in the Borough. Whilst this is the case, it is also accepted that there might be locally specific pressures of over subscription that needs to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is seeking to work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

**Contributor Reference:** 00979/3/001  
**Customer Name:** Mr Andrew Halstead

**Summary of representation:**

Objects to the proposal to designate the Martyrs Lane site for Woking's future housing needs. The site is unsuitable for 3000 plus houses for the following reasons.

The proposal will be a massive intrusion into the Green Belt in north Woking. The other safeguarding proposals would spread development evenly around the Borough and a more sustainable solution that putting all development in one location.

The proposal should not be considered in isolation as there are development proposals for Fair Oaks and Sheerwater. The road network that serves these areas are already at capacity and further development would make the situation worse.

A large housing development would have a significant adverse impact on Horsell Common, as will Fair Oaks if that too is developed for housing. Horsell Common is a SSSI and part of the Thames Basin Heaths SPA, and contains protected heathland birds. They would be at risk should the development take place due to an increase in recreational usage of the site. Horsell Common is also an important habitat for insects and reptiles and therefore should not be put at risk of degradation by placing most of Woking's future housing development in close proximity.

The proposal is in conflict with the sustainable development requirements of the NPPF. In addition, it is also in conflict with paragraph 114,

**Officer Response:**

Objection noted.

It should be noted that the consultation on land to the east of Martyrs Lane is to safeguard the site for future development needs between 2027 and 2040. The consultation specifically noted that it is anticipated that the site is sufficient to enable the delivery of at least 1200 net additional homes and the necessary green and other infrastructure to support the potential development of the site. Therefore the reference to 3000 plus houses in the representation is in excess of what the Council was consulting on.

The representations regarding the Green Belt, traffic and congestion, wildlife and sustainable development have been addressed by the Council in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

In addition, as part of the Martyrs Lane consultation the Council has consulted with a range of wildlife and environmental organisations including Natural England, Surrey Wildlife Trust and

Horsell Common Preservation Society. Their individual representations have been considered by the Council and will inform the Council's decision on its preferred safeguarding option.

It should also be noted that the Council has identified a number of SANG's across the borough in accordance with the Thames Basin Heaths SPA Avoidance Strategy and Core Strategy Policy CS8. These green spaces provide a suitable alternative to the Thames Basin Heaths SPA's to ensure that new development across the borough does not have an adverse impact on the SPA. These sites are set out in the Regulation 18 version of the Site Allocations DPD.

Whilst the Council has responded to the representation on sustainable development within the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper, it should be noted that the Council has a number of adopted policies in place to protect and enhance the natural environment as well as ensure that development is designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These are clearly set out in the Core Strategy and the Development Management Policies DPD, both of which have been approved by the Secretary of State. In addition, the Council has also published Natural Woking which is a biodiversity and green infrastructure strategy for the area. This seeks positive outcomes for habitats and people, by enhancing provision and accessibility to green spaces; conserving appropriate existing biodiversity and habitats; and creating opportunities for species to return to the Borough.

Due to former land uses within the Martyrs Lane site, any potential development could remediate contaminated land that exists on the site. The proposal therefore is consistent with Paragraph 109 of the NPPF. This has also be set out with the Sustainability Appraisal for the site (objective 8) which is on the Council's website.

**Contributor Reference:** 01005/1/001  
**Customer Name:** Ms Katrina Warne

**Summary of representation:**

The land to the east of Martyrs Lane is a better site if more housing is required. However concerned about the increase in traffic as the existing roads are at capacity. The existing situation has not been helped with the on going problems on Chertsey Road.

**Officer Response:**

Support for the principle of safeguarding this site for future development needs is noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00980/1/001  
**Customer Name:** Mr Robert Humphries

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00982/1/001  
**Customer Name:** Ms Tracey Marshall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00983/1/001  
**Customer Name:** Ms Dorelle Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00984/1/001  
**Customer Name:** Ms Dolly Brodribb

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00985/1/001

**Customer Name:** Ms Sue Doree

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00986/1/001  
**Customer Name:** Mr Andrew Newman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00987/1/001  
**Customer Name:** Mr Guy Braithwaite

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00988/1/001  
**Customer Name:** Lesley Galloway

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00989/1/001  
**Customer Name:** Mr David Phillpot

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00990/1/001  
**Customer Name:** Ms Jane Chapman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00991 /1 /001  
**Customer Name:** Mr Jamie Oughton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00096/1/001  
**Customer Name:** Mr Robert Shatwell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00992/1/001

**Customer Name:** Ms Sheila Sen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00993/1/001  
**Customer Name:** Ms Catherine Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00994/1/001  
**Customer Name:** Ms Claire Lowe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00995/1/001  
**Customer Name:** Mr Matthew Davey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00996/1/001  
**Customer Name:** Ms Tracie Critchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00997/1/001  
**Customer Name:** Lamene A M Newman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00998/1/001

**Customer Name:** Mr Alan Coy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00999/1/001  
**Customer Name:** Ms Rita Tallent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01000/1/001  
**Customer Name:** Ms Grace Bradshaw

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01001/1/001  
**Customer Name:** Ms Lyn Wellbelove

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00913/2/001

**Customer Name:** V M Fleet

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01002/1/001  
**Customer Name:** Mr Alan Warwick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01003/1/001  
**Customer Name:** Ms Carol Dent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01004/1/001  
**Customer Name:** Ms Megan Stevens

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01006/1/001  
**Customer Name:** Mr Tony Wellbelove

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01007/1/001  
**Customer Name:** Mr Mark Morris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01008/1/001  
**Customer Name:** Ms Stacey Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01009/1/001  
**Customer Name:** Mr Simon Forrest

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01010/1/001  
**Customer Name:** Ms Julie Clack

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01011/1/001

**Customer Name:** Mr And Mrs Chris And Veronica Hollis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01012/1/001  
**Customer Name:** Mr Richard Crowe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01013/1/001  
**Customer Name:** Ms Claire Hart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01014/1/001  
**Customer Name:** Mrs Amrat Cobb

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01015/1/001  
**Customer Name:** Mr Graham Hepburn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01016/1/001  
**Customer Name:** Mr Raymond A Forrest

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01017/1/001  
**Customer Name:** Mr Anthony Cummins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01017/2/001  
**Customer Name:** Mr Anthony Cummins

### **Summary of representation:**

Objects because:

- Would impose intolerable strains on overstretched road infrastructure
- Pressure on Horsell Common due to increased leisure use
- Irrational to propose a site with development potential for over 3000 units in substitution for the previous sites that offer only 1000
- A more modest proposal might be more appropriate e.g. on New Zealand golf course
- Future development should be dispersed around the Borough rather than concentrated in one single area, in the interests of fairness

### **Officer Response:**

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses some of the issues raised in the representation in detail, including infrastructure capacity (including transport infrastructure).

The sites' proximity to the Horsell Common Thames Basin Heaths SPA and SSSI is noted. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

The site would not be safeguarded for 3000 units. It is anticipated that the site is sufficient to enable the delivery of at least 1200 net additional homes, as well as the necessary green and other infrastructure to support the potential development of the site.

Due to the need to ensure a defensible boundary of the Green Belt, the northern parcel of land above the Golf Course has been included in the proposal. The size of the site will allow future development needs to be delivered. Availability of land is a significant material consideration (but not the only consideration) for the Council to take into account in deciding its preferred approach to safeguarding for the purposes of the Regulation 19 consultation. The land east of Martyrs Lane is in multiple ownership, and the New Zealand Golf Course and McLaren collectively owns a significant proportion of the land. The New Zealand Golf Course has written to the Council and has made formal representation as part of the consultation to confirm that the part of the land that is in its ownership will not be made available now, in the future and never to meet future development needs. In this regard, there is no expectation for a change in their position within and beyond five years. The representations from the New Zealand Golf Course are addressed in full separately.

The lack of availability of the above sites could cast doubt on the deliverability of the land if it is safeguarded. To put it into context, assuming the two sites will not be available to meet

future development needs and the Surrey County Council's Waste Safeguarded Site is also not available, the residual land will only deliver about 300 dwellings (at 30 dph) as against the 1,200 dwellings that the Council wish to safeguard land. If the Waste Safeguarded Site is made available, there will be sufficient land to enable the delivery of about 600 dwellings at the same density. This is still significantly short of what is needed. Importantly, the Council has to make sure that any land that it safeguards would not lead to an isolated development within the Green Belt.

It is emphasised that the lack of availability of the two sites does not entirely rule out the development of the land or any part of it. The Council can bring forward the development of the land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the land is the most sustainable when compared with the original six safeguarded sites.

**Contributor Reference:** 01018/1/001  
**Customer Name:** Ms Maria Maddox

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01020/1/001

**Customer Name:** Mr And Mrs John And Jackie Douch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01021/1/001  
**Customer Name:** Mr Jason Waplinton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01022/1/001  
**Customer Name:** Mr Michael Dragoyevich

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01023/1/001

**Customer Name:** Ingvild Reeve

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01024/1/001  
**Customer Name:** Ms Alison Oag

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01025/1/001

**Customer Name:** Robyn Dexter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01026/1/001

**Customer Name:** Ms Georgia Natasha Blanco-Litchfield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01027/1/001  
**Customer Name:** Mr Steve Reeve

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01028/1/001  
**Customer Name:** Mr David Meller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01029/1/001  
**Customer Name:** Ms Kathryn Warwick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02680/1/001  
**Customer Name:** Mr Patrick Gibbon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The area is teeming with wildlife, from insects, reptiles, amphibians to two types of deer, and badgers. Their habitat would be lost.

There are inadequate doctors surgeries to cope with this development. The roads are inadequate, particularly Woodham Lane.

**Officer Response:**

The Council's response to the representation, including concerns about wildlife, habitats and adequate infrastructure, can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

**Contributor Reference:** 00863/1/001

**Customer Name:** Philip

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00864/1/001

**Customer Name:** Ms Rebecca Scholes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00865/1/001  
**Customer Name:** Mr Matt Martin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00866/1/001  
**Customer Name:** Ms Claire Spencer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00867/1/001

**Customer Name:** Mr Kenneth Andrews

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00868/1/001  
**Customer Name:** Mr Robert Green

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00870/1/001  
**Customer Name:** Mr Adam Jenkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00871 /1 /001  
**Customer Name:** Ms Cindy Barnes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00872/1/001  
**Customer Name:** Ms Hilary Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00873/1/001  
**Customer Name:** Mr Malcolm Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00874/1/001  
**Customer Name:** Ms Christine King

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00875/1/001  
**Customer Name:** Mr David Bumstead

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00876/1/001  
**Customer Name:** Mr Albert Brooks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00877/1/001  
**Customer Name:** Ms Joan Brooks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00878/1/001  
**Customer Name:** Ms Karen Brooks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00879/1/001  
**Customer Name:** Mr Jeremy Bailes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00880/1/001  
**Customer Name:** Mr Stephen Houghton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00881 /1 /001  
**Customer Name:** Ms Annie Hlava

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00092/2/001  
**Customer Name:** Ms Eira Meller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00883/1/001  
**Customer Name:** Ms Ann Florance

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00884/1/001  
**Customer Name:** Ms Lucy Trustam

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00885/1/001  
**Customer Name:** Ms Jacqueline Horwell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00886/1/001  
**Customer Name:** Mr Brian Meinke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00887/1/001  
**Customer Name:** Ms Angela Hinton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00889/1/001  
**Customer Name:** Mr Daniel Stilwell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00890/1/001  
**Customer Name:** Ms Victoria Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00891 /1 /001  
**Customer Name:** Ms Debi Henderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00892/1/001  
**Customer Name:** Mr Mike Doyle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00893/1/001  
**Customer Name:** Mr Matthew Spencer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00894/1/001

**Customer Name:** Pat Meller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00895/1/001  
**Customer Name:** Ms Hollie May

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00896/1/001  
**Customer Name:** Mr Brian Meller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00897/1/001  
**Customer Name:** Mr David Head

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00898/1/001  
**Customer Name:** Ms Molly Warden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00899/1/001  
**Customer Name:** Mr Alan Fahey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00900/1/001

**Customer Name:** Mr Tim King

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00901/1/001  
**Customer Name:** Mr Robert Fairless

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00902/1/001  
**Customer Name:** Mr Josh Barnett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00950/1/001  
**Customer Name:** Mr Richard Bowden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00951/1/001  
**Customer Name:** Mrs Carolyn Garnett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00241/1/001  
**Customer Name:** Mr E J Ghisoni

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00869/1/001

**Customer Name:** Mr Frank Ray

**Summary of representation:**

Supports the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 00888/1/001  
**Customer Name:** Mrs Carol Scrivner

### **Summary of representation:**

The site is big enough (112 hectares) to accommodate 1,200 houses, including affordable housing, one or more Gypsy and Traveller sites, and the necessary infrastructure of shops, primary schools, health centre etc. There are advantages in the creation of a single new larger housing estate rather than several dispersed small ones. It is much easier to create the associated infrastructure rather than overloading existing over-stretched facilities. It will also simplify the process for obtaining planning permission

There are major employers close by: St Peter's Hospital, the Animal and Plant Health Agency, McLaren Technology Centre and the Brooklands Retail Park. A new neighbourhood centre on the site would subsequently provide additional employment opportunities.

The A320 gives easy access to the M25 and Heathrow Airport to the north, and to Woking Town Centre and the mainline railway station to the South without encountering the traffic delays where roads cross railway lines. Bus routes and cycle routes, including to Woking Town Centre, exist already. There is little development along the A320 North of Woking, making road widening relatively easy if necessary. This is a better proposal than the option of building South of Woking where the A320 is often at a standstill in the morning rush-hour and that is before the new Hoe Valley School has opened.

The Martyrs Lane site, although in the Green Belt, has no other National or Local landscape designation unlike some of the other proposals, such as those here at Mayford. There are no Escarpment and Rising Ground Landscape Importance issues such as those faced in GB10, GB11 and GB13.

Most of the site is clear of Flood 2 and Flood 3 designations which should make the planning and development process simpler and more cost effective.

North of the New Zealand golf course the land is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Master planning of the total residential development would allow for the provision of Affordable Housing where the Council's Core Strategy (CS12) states that 35% of all new homes should be Affordable Housing but admits that this target is not being met. In a similar vein, the Council also admits that it is struggling to meet its target for the provision of Specialist Residential Accommodation (CS13) for older people and vulnerable groups as "land values for sites allocated for general residential development can make securing sites for more specialist accommodation difficult in terms of viability and availability." Use of the Martyrs Lane site can help Woking to meet its requirements under CS12 and CS13.

Martyrs Lane could be used to provide pitches for Gypsies and Travellers wanting to live to the East of Woking. Currently, almost all other pitches are at the South West side of Woking in Heathlands Ward (Mayford), restricting Gypsy and Traveller choice as to where they can live. Gypsy and Traveller sites would be sustainable by virtue of being within the residential development site and would satisfy CS14, Gypsy and Traveller pitch criteria, which includes the requirement to avoid unacceptable adverse impacts on the visual amenity and character of the area. Gypsy and Traveller pitches included in this residential development would count towards the requirement for Woking Borough Council to find 24 pitches from 2016–2027, and an additional 9 pitches from 2027–2040. Land at Martyrs Lane could easily accommodate one or more Traveller sites to satisfy a target of 15 pitches, thereby removing the Ten Acre Farm (GB7) Traveller site proposal.

Because of the size of the Martyrs Lane area – it is almost twice the size as the six sites it might replace – it should be possible to build all the properties necessary to fulfil Woking's future Housing and Traveller needs, even if it subsequently turns out that more than 1,200 houses are needed, or if there is a further requirement post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

#### **Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD. Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers as set out in the Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At Regulation 18 stage, officers had recommended to Council that need for Traveller accommodation should be met at Five Acres and Ten Acres. That need is 19 pitches up to 2027. At the Council meeting, Members requested that officers revisit this recommendation and report to them before making a decision about their strategy for Regulation 19 consultation. Officers accordingly are investigating this matter and will be reporting to Council in due course.

A detailed flood risk assessment will be a requirement of any development proposal that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was originally overlooked.

Mr Freeland's comments relating to planning application reference PLAN/2011/0823 has been noted. His comment about urban sprawl was made in an entire different context that is distinct from the site Allocations DPD process. The Council has carried out two separate independent consultant studies. They have both concluded that the development of the site would lead to urban sprawl and an encroachment into the Green Belt. This view is shared by Officers in this particular context. Whilst it is not intended to underplay the significance of Mr Freeland's comments as a material consideration, the conclusions of the two independent studies are sufficiently clear in its analysis and logic and robust enough to give them far greater weight.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

**Contributor Reference:** 00919/1/001  
**Customer Name:** Worplesdon Parish Council

**Summary of representation:**

To prevent the coalescence of Woking and Guildford, the strategic gap between the two towns should be strenuously protected against encroachment into the Green Belt. There is insufficient parking available at Worplesdon Station to cope with current demand.

Lack of street lighting at Worplesdon Station due to the County Council insufficient funds and the detrimental environmental impact this would have on Prey Heath Common SSSI, Smarts Heath SSSI and Whitmoor Common SPA/SSSI.

The A320 Woking Road is already running close to capacity (DFT statistics for 2015 shows 19,321 vehicle movements per day). Given the potential impact on the local highway network of the proposed brownfield development at Slyfield and the proposals for Gosden Hill, Burpham together with other significant development in the Borough of Guildford and surrounding towns this is likely to increase significantly.

The Parish Council feels the substitution of land parcels GB4, GB5, GB10, GB11, GB12 and GB13 with Martyrs Lane offers the least worst option. Any development at Martyrs Lane to come with the strong caveat that Woking Borough Council must ensure the Environmental Protection of Horsell Common SPA/SSSI.

**Officer Response:**

Support noted.

The justification for the release of Green Belt land for the development has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper. The matters regarding infrastructure, traffic, Worplesdon Station and pavements have already been addressed in the 'Regulation 18 issues and matters Topic Paper', please refer to section 1.0, 12.0, 14.0, 15.0, E, V and U for the Council response.

The Council has undertaken a Green Belt Review, which considered the purposes of the Green Belt. The report found that development of GB10 and GB11 would not cause merging of the two towns. This report can be found on the Council Website.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 00926/1/001  
**Customer Name:** Mr Brian McKendry

**Summary of representation:**

The A320 by the Martyrs Lane site is slow but rarely at a standstill during the rush hour whereas it is usually at a standstill in the stretch to the south of Woking which will soon become even more pressured due to school traffic once the new Hoe Valley School is opened. Access to the M25 is easier from Martyrs Lane than south Woking shortening journey times and limiting traffic through Woking itself.

There is far more land available for A320 development in the Martyrs Lane site area than to the south of Woking, making this and potential future expansion more manageable. The size of the Martyrs Lane site enables a single housing estate to be developed rather than a number of smaller estates leading to savings on infrastructure costs.

Some of the alternative development proposals have national or local designations whereas the Martyrs Lane site, although green belt, has no designations.

**Officer Response:**

Support noted.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet more than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of

studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts at the development management stage, this would be the same process for the other sites as well. The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

**Contributor Reference:** 00905/1/001  
**Customer Name:** Mr Michael Le'Bez

**Summary of representation:**

Green Belt is allocated for a reason, such as to provide open spaces where environments are protected, for people, plants and wildlife and to protect against urban sprawl leading to loss of community identity.

The Green Belt in Byfleet has been slowly eroded. Byfleet village is already over developed without suitable community facilities e.g. a doctor's surgery, the schools are full, parking problems and traffic congestion.

In addition much of Byfleet is on a flood plain and any further development would worsen the frequent flooding problems.

The approved development at Broadoaks will cause further congestion on the roads in Byfleet and the surrounding area. The Broadoaks site and part of the Martyrs Lane site are on Green Belt land which has already been developed.

Green Belt is precious and the Council should respect our needs, our communities and our environment.

**Officer Response:**

The justification for the release of Green Belt land for development and future development needs has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper. The matters regarding infrastructure, flood plains and traffic congestion have also been addressed in the 'Regulation 18 Consultation issues and matters topic paper', please refer to section 1.0, 3.0, 5.0, 15.0, J, K, L, and U for the Council's response.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

**Contributor Reference:** 00949/1/001  
**Customer Name:** Ms Linda Lewis

**Summary of representation:**

There is better infrastructure already in place then in comparison to the other sites such as access to the M25, Woking, West Byfleet, New Haw using the A245 and A320. Using the land currently allocated as a golf course and the other areas within the site that have a very low current population or no population appears to be a much better alternative. Also a new school is planned for the old Broadoaks site which would be easily accessible to the new site as bus and cycle routes are already in place.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

In terms of roads and infrastructure, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from

various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited.

The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per

week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses therefore do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited.

As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

**Contributor Reference:** 00882/1/001  
**Customer Name:** Ms Carol Le'Bez

**Summary of representation:**

Green Belt is allocated for a reason, such as to provide open spaces where environments are protected, for people, plants and wildlife and to protect against urban sprawl leading to loss of community identity.

The Green Belt in Byfleet has been slowly eroded. Byfleet village is already over developed without suitable community facilities e.g. a doctor's surgery, the schools are full, parking problems and traffic congestion.

In addition much of Byfleet is on a flood plain and any further development would worsen the frequent flooding problems.

The approved development at Broadoaks will cause further congestion on the roads in Byfleet and the surrounding area. The Broadoaks site and part of the Martyrs Lane site are on Green Belt land which has already been developed.

Green Belt is precious and the Council should respect our needs, our communities and our environment.

**Officer Response:**

The justification for the release of Green Belt land for development and future development needs has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper'. The matters regarding infrastructure, flood plains and traffic congestion have also been addressed in the 'Regulation 18 Consultation issues and matters topic paper', please refer to section 1.0, 3.0, 5.0, 15.0, J, K, L, and U for the Council's response.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

**Contributor Reference:** 00958/1/001

**Customer Name:** Fiona

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00959/1/001  
**Customer Name:** Ms Jane O'Brien

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00960/1/001  
**Customer Name:** Ms Anita Dexter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00961 /1 /001  
**Customer Name:** Ms Amelia Snare

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00928/1/001  
**Customer Name:** Mr Peter Stanley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00929/1/001  
**Customer Name:** Mr Lee Goredema

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00930/1/001  
**Customer Name:** Ms Nadine Helling

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00931 /1/001  
**Customer Name:** Mr Andrew Baker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00932/1/001

**Customer Name:** Yoko Crow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00933/1/001

**Customer Name:** Alejandro

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00934/1/001  
**Customer Name:** Ms Killian Dunne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00935/1/001

**Customer Name:** Ms Kim Crane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00936/1/001  
**Customer Name:** Ms Julie Argent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00937/1/001  
**Customer Name:** Ms Karina Cowan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00938/1/001  
**Customer Name:** Ms Natalie Hammond

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00939/1/001

**Customer Name:** Kali Patel

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00940/1/001  
**Customer Name:** Ms Nicola Regan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00941 /1 /001  
**Customer Name:** Mr Kevin White

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00942/1/001  
**Customer Name:** Ms Alice Cherry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00943/1/001  
**Customer Name:** Mr Dominic O'Carroll

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00944/1/001  
**Customer Name:** Ms Jessica White

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00945/1/001  
**Customer Name:** Ms Cerys McCormack

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00946/1/001

**Customer Name:** Ms Jo Barnett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00947/1/001  
**Customer Name:** Mr Alex Stewart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00948/1/001  
**Customer Name:** Ms Mandy Hopkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00861/1/001  
**Customer Name:** Mr Steve Gynn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00952/1/001

**Customer Name:** Michelle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00953/1/001  
**Customer Name:** Ms Sarah Russell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00954/1/001  
**Customer Name:** Ms Lisa Trotter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00955/1/001  
**Customer Name:** Ms Caz Atthill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00956/1/001  
**Customer Name:** Mr Martyn Cayless

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00957/1/001  
**Customer Name:** Ms Caroline Hassanein

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00903/1/001

**Customer Name:** Balfour

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00904/1/001  
**Customer Name:** Mr Frank Beken

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00906/1/001

**Customer Name:** Mrs C Carroll

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00109/2/001

**Customer Name:** Mr And Mrs Martin And Shirley Bartley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00907/1/001  
**Customer Name:** Mr Peter James Carroll

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00666/1/001  
**Customer Name:** Ms Penny Johnson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00908/1/001  
**Customer Name:** Ms Mary Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00909/1/001  
**Customer Name:** Ms Sally Foster

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00910/1/001  
**Customer Name:** Ms Paula Grant

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00911/1/001  
**Customer Name:** Ms Carolyn Wright

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00912/1/001

**Customer Name:** Ms Karen Greenway

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00913/1/001

**Customer Name:** V M Fleet

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00914/1/001  
**Customer Name:** Mr Richard Fleming

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00915/1/001  
**Customer Name:** Mr John Garnett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00916/1/001

**Customer Name:** Jackie Stuart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00917/1/001  
**Customer Name:** Ms Anna–Maria Allan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00918/1/001  
**Customer Name:** Mrs D Arundale

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00920/1/001  
**Customer Name:** Ms Katie Pugh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00921 /1 /001

**Customer Name:** Aksan Shaffi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00922/1/001  
**Customer Name:** Ms Sarah Turnbull

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00923/1/001  
**Customer Name:** Ms Rebecca Warwick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00924/1/001  
**Customer Name:** Ms Charlotte Lynn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00925/1/001  
**Customer Name:** Mr Richard Clutterbuck

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00927/1/001  
**Customer Name:** Ms Glynis Hatchwell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00862/1/001  
**Customer Name:** Ms Lyndsay Piper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00843/1/001

**Customer Name:** Mr Dan Letch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00844/1/001

**Customer Name:** Ms Sophie Campion

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00845/1/001

**Customer Name:** Skina Nazir

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00846/1/001  
**Customer Name:** Ms Jayne Skelton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00847/1/001

**Customer Name:** Ms Anne Bell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00848/1/001  
**Customer Name:** Dr Penny Gilham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00849/1/001  
**Customer Name:** Ms Marion Knight

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00850/1/001  
**Customer Name:** Ms Amy Knight

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00851/1/001

**Customer Name:** Riki

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00852/1/001  
**Customer Name:** Mr Michael Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00853/1/001  
**Customer Name:** Mr Michael Pearson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00854/1/001  
**Customer Name:** Ms Elaine Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00855/1/001  
**Customer Name:** Ms Hayley Gerhardt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00856/1/001  
**Customer Name:** Mr John Jordan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00857/1/001  
**Customer Name:** Mr Paul Dougan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00858/1/001  
**Customer Name:** Mr John Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00859/1/001  
**Customer Name:** Ms Lucy Fryett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00860/1/001  
**Customer Name:** Kota Shivarankan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00802/1/001  
**Customer Name:** Mr Anthony Clark

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00803/1/001  
**Customer Name:** Mr Christian Petrou

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00801/1/001  
**Customer Name:** Mr Martin Foster

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00804/1/001  
**Customer Name:** Mr Richard Heron

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00805/1/001  
**Customer Name:** Ms Clare Robinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00806/1/001  
**Customer Name:** Ms Audrey Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00807/1/001  
**Customer Name:** Ms Chris Owen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00809/1/001  
**Customer Name:** Ms Joy Elizabeth Waine

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00810/1/001  
**Customer Name:** Mrs Irene Izzard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00811/1/001  
**Customer Name:** Mr Michael Waine

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00812/1/001

**Customer Name:** Nicky

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00813/1/001  
**Customer Name:** Mr And Mrs B Diton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00816/1/001

**Customer Name:** Ms Ami Ford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00817/1/001  
**Customer Name:** Mrs M A O'Sullivan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00819/1/001

**Customer Name:** Mr Clive Kelly

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00820/1/001

**Customer Name:** Mr John Collingwood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00771/1/001  
**Customer Name:** Mr Andre Da Silva Goncalves

**Summary of representation:**

Since leaving London, the main things about Woking is the greenery and nature. Woking Borough Council will be letting themselves and the community down by building over the Green Belt. There must be another option.

**Officer Response:**

In terms of protection of the Green Belt. The Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes. The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred

site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 00801/2/001  
**Customer Name:** Mr Martin Foster

**Summary of representation:**

The site is unsuitable for many reasons such as Flood plain, unsuitable ground, green belt, too much traffic on bordering roads. Why not build affordable housing on the many sites currently occupied by empty offices?

**Officer Response:**

Please refer to the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper' for the matters of flood plain, Green Belt, traffic and unsuitable ground.

In terms of building affordable housing on empty office sites, the council has identified derelict office sites which could be used for housing within the Strategic Housing Land Availability Assessment (SHLAA). However, the outcome of the SHLAA indicated a shortfall in the capacity of the urban area to meet the requirement over the plan period. Overall, about 13 years supply of land could be identified in the urban area to meet housing need. The Inspector agreed that the Green Belt should be identified as a potential direction for future growth to meet housing need between 2022 and 2027. He concluded that 'by this approach the Core Strategy takes a justified and effective approach to issues relating to the Green Belt and the natural environment which is consistent with national planning policy'.

The Site Allocations DPD also safeguards sites for employment. It would be inappropriate to allocate all empty offices into residential use.

Moreover, the Prior approval Process under the provisions of Class O, Part 3 of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) allows for Offices (Use Class B1) to be converted into residential dwellings (Use Class C3) subject to specific criteria stated in the Order.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 00808/1/001  
**Customer Name:** Ms Dawn Jolley

**Summary of representation:**

Objects to the use of land at Pyrford, Mayford, Byfleet and Martyrs Land. Do not agree with building 292 dwellings per year as Woking is crowded enough and should not compromise existing residents. The population is already over 100,000 and Woking's location and infrastructure is the envy of the country and should be kept that way. Objects to the removal of the Green belt and Woodlands. The roads cannot cope with the extra traffic. An extra 50 houses would be acceptable in Woodham but not 500 houses.

**Officer Response:**

The justification of 292 new dwellings each year has been comprehensively explained in the 'Regulation 18 Consultation Issues and Matters Topic Paper', please refer to section 1.0.

In terms of traffic congestion, the loss of Green Belt and the woodlands, these issues have all been addressed in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper ', please refer to each particular section for the Council response.

**Contributor Reference:** 00814/1/001  
**Customer Name:** Ms Lynn Spankie

**Summary of representation:**

The surrounding area is already saturated with traffic so couldn't cope with any further cars.

**Officer Response:**

In terms of traffic congestion, this issue has been addressed in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper', please refer to the Transport section for the Council response.

**Contributor Reference:** 00815/1/001  
**Customer Name:** Mr Martin Spankie

**Summary of representation:**

The A320 is one of Woking's vital transport links, but is quite incapable of absorbing the additional traffic that would be generated by the East of Martyr's Lane proposed development.

**Officer Response:**

In terms of traffic congestion, this issue has been addressed in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper', please refer to the Transport section for the Council response.

**Contributor Reference:** 00769/1/001  
**Customer Name:** Mr Sachin Adhiya

**Summary of representation:**

Development would ruin the most beautiful and ecologically rich area of the Woking borough. There are other locations of the borough where development is more conducive.

**Officer Response:**

The land is not covered by any absolute environmental constraints. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

**Contributor Reference:** 00818/1/001  
**Customer Name:** Ms Elaine Fawdry

**Summary of representation:**

The proposal to develop the site to the East of Martyr's Lane is far superior as it is less bity and a cohesive community would be established. This land has no real benefit as a community asset as it is, with the exception of the excellent Recycling Centre. We need more homes but the Council must make sure that infrastructure needs are met so as not to overburden existing facilities.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy and indeed for the development of any of the other proposed six safeguarded sites. An example is the Infrastructure Delivery Plan which is available on the Council's website.

**Contributor Reference:** 00779/1/001  
**Customer Name:** Ms Martine Kinsman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00780/1/001  
**Customer Name:** Ms Jo McClements

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00781/1/001  
**Customer Name:** Ms Denise Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00782/1/001  
**Customer Name:** Mr Michael Collins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00783/1/001  
**Customer Name:** Ms Sandra Peet

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00784/1/001  
**Customer Name:** Mr David Spencer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00785/1/001  
**Customer Name:** Mr David Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00786/1/001  
**Customer Name:** Ms Cliodhna Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00787/1/001  
**Customer Name:** Ms Niamh Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00788/1/001  
**Customer Name:** Ms Tanya Ogland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00789/1/001  
**Customer Name:** Ms Carol Hyde

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00790/1/001  
**Customer Name:** Mr Stuart Hyde

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00791 /1 /001  
**Customer Name:** Mr Neil Hutchings

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00792/1/001  
**Customer Name:** Ms Jan Pembroke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00793/1/001  
**Customer Name:** Ms Monica McKinnell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00794/1/001  
**Customer Name:** Ms Linda Futcher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00795/1/001  
**Customer Name:** Mr Bruce Garner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00796/1/001  
**Customer Name:** Ms Natasha Garner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00797/1/001  
**Customer Name:** Mr David Copeland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00798/1/001  
**Customer Name:** Ms Karen Bullett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00799/1/001

**Customer Name:** Marcella Kelly

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00800/1/001

**Customer Name:** Mr J J Perkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00764/1/001  
**Customer Name:** Mr Brian Reed

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00765/1/001  
**Customer Name:** Mr Garry Stansby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00766/1/001  
**Customer Name:** Ms Karen Murphy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00767/1/001  
**Customer Name:** Ms Miriam Blunden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00768/1/001  
**Customer Name:** Mr Matthew Haigh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00770/1/001  
**Customer Name:** Ms Jane Cameron

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00772/1/001  
**Customer Name:** Mr Robert East

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00773/1/001  
**Customer Name:** Mr R Taoka-Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00774/1/001  
**Customer Name:** Mr Dave Watkinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00775/1/001

**Customer Name:** C Stewart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00776/1/001  
**Customer Name:** Mr And Mrs Baker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00777/1/001  
**Customer Name:** Ms Susan Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00778/1/001  
**Customer Name:** Ms Danielle Stewart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00821/1/001  
**Customer Name:** Mr Anthony John Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00822/1/001  
**Customer Name:** Mr David Peet

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00823/1/001  
**Customer Name:** Mr Clive Milam

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00824/1/001  
**Customer Name:** Ms Jane Cooper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00825/1/001  
**Customer Name:** Mr And Mrs W N Preston

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00826/1/001  
**Customer Name:** Mr Renato Bortoli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00827/1/001  
**Customer Name:** Ms Dawn Campion

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00828/1/001

**Customer Name:** Mr And Mrs John And Mary James

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00829/1/001  
**Customer Name:** Ms Janet Conway

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00830/1/001

**Customer Name:** Ineke Clewer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00831 /1/001  
**Customer Name:** Mr James Whittington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00833/1/001  
**Customer Name:** Ms Suzanne Wright

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00832/2/001  
**Customer Name:** Mr David Ludlow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00834/1/001  
**Customer Name:** Mr Noel Hehir

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00835/1/001  
**Customer Name:** Ms Naomi Raval

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00836/1/001  
**Customer Name:** Mr David Tonks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00837/1/001  
**Customer Name:** Mr Simon Akers

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00838/1/001  
**Customer Name:** Ms Amy McQuade

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00839/1/001  
**Customer Name:** Ms Denise Murfitt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00840/1/001  
**Customer Name:** Ms Kerry Chessell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00841 /1 /001  
**Customer Name:** Mr Peter Murfitt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00842/1/001  
**Customer Name:** Ms Anne Coleman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00741 /1 /001  
**Customer Name:** Ms Sarah Mulhall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00742/1/001  
**Customer Name:** Mr Marc Mulhall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00743/1/001

**Customer Name:** Ms Avril Wells

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00744/1/001  
**Customer Name:** Mr Robert Wells

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00745/1/001  
**Customer Name:** Mr Adrian Walker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00728/1/001

**Customer Name:** Mr A Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00729/1/001  
**Customer Name:** Mr Mark Bromley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00635/1/001  
**Customer Name:** Ms Hilary Davison

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00730/1/001  
**Customer Name:** Mr Brian Cameron

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00731/1/001  
**Customer Name:** Mr David Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00732/1/001  
**Customer Name:** C Brunton-Green

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00733/1/001

**Customer Name:** Ms Tina Gill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00734/1/001  
**Customer Name:** Ms Constance Appelbe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00735/1/001  
**Customer Name:** Ms Rachel Torzillo

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00736/1/001  
**Customer Name:** Mr Jack Harding

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00688/1/001  
**Customer Name:** Mr Jason Doran

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00689/1/001  
**Customer Name:** Ms Julie Dixon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00690/1/001  
**Customer Name:** Ms Sandra Goode

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00691 /1/001

**Customer Name:** Mr Karl Dixon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00693/1/001  
**Customer Name:** Mr Frank Fisher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00694/1/001  
**Customer Name:** Ms Emily Byrne

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00695/1/001  
**Customer Name:** Mr Chris Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00696/1/001  
**Customer Name:** Mrs Jennifer Quirk

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00697/1/001  
**Customer Name:** Ms Ashleigh Foster

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00698/1/001  
**Customer Name:** Mr Anthony Quirk

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00699/1/001

**Customer Name:** Mr Stuart Roy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00700/1/001  
**Customer Name:** Mr Ian Nicholson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00701/1/001  
**Customer Name:** Ms Penny Fazackerley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00703/1/001  
**Customer Name:** Mr Michael White

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00704/1/001  
**Customer Name:** Mr Peter Short

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00705/1/001  
**Customer Name:** Ms Jane Archer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00707/1/001  
**Customer Name:** Ms Sheila Butler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00739/1/001  
**Customer Name:** Ms Carolyn Houghton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00692/1/001  
**Customer Name:** Ms Lucy Peters

**Summary of representation:**

There is insufficient infrastructure and the loss of wildlife.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

**Contributor Reference:** 00702/1/001  
**Customer Name:** Ms Edwina Parsons

**Summary of representation:**

Support the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040. Some of the reasons for this are as follows:

It is on previously developed land which is not true of the other proposed sites. The Infrastructure in the other sites such as A245 through West Byfleet & over M25 bridge has virtually no capacity left, especially when other new development in the area is taken into account.

Safeguarding one site for the future housing needs of Woking would probably mean "economies of scale" and would help to find solutions to many of the infrastructure concerns.

The Amenity value of the Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from all across the Borough.

The Heritage features of the area which incorporates the two Pyrford fields includes the historic wooded grounds of Pyrford Court which are grade II listed, Pyrford Village Conservation Area, Pyrford Common, designated as a Site of Nature Conservation Interest, Aviary Road Conservation Area and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area.

The Landscape in Pyrford is protected by Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance.

The Agriculture of Pyrford's fields have been farmed for centuries and include good quality agricultural land. The agricultural fields make an important contribution to the rural character of the area and provide an important setting for the southern entrance to the town.

**Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion along the A245 Woodham Lane/Sheerwater/Parvis Road corridor. It is therefore likely that development at Martyrs Lane will have similar effects on the A245 corridor as the original six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts on the A245 corridor. This work is on-going and will be completed before the DPD is submitted for Examination.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% (excluding Martyrs Lane) of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

The reference to Woking Core Strategy policy CS24 as 'escarpment and rising ground of landscape importance' is noted and taken into account. The Peter Brett report however recommends that the land to the rear of 79 - 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 - 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 - 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed

nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road.

The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

**Contributor Reference:** 00706/1/001  
**Customer Name:** Mr Robert Tilley

### **Summary of representation:**

It may be necessary that Green Belt land be use to meet the house building targets beyond 2027. The question therefore is which site (s) in the Green Belt should be used.

In the earlier consultation arguments were made against the 2 Pyrford sites, particularly to the east of Upshot Lane which may impinge on views from the Surrey Hills AONB. Both sites are farmed and are some distance from important transport, schools, shopping and health facilities in West Byfleet and beyond. These sites are attractive environmentally and are not sustainable. Some of these arguments equally apply to the other 4 sites in Byfleet and Mayford.

The Martyrs Lane site whilst again in the Green Belt has many advantages and will be better than the 6 sites in Pyrford, Byfleet and Mayford. As much of the north of the site is not attractive, it comprises a former nursery and recreational facilities both no longer used and there is some evidence of former military use. There are no public right of ways and therefore not accessible by the public.

The northern section was given planning permission of the expansion of the McLaren site. McLaren's later substituted a site on their main site to the east but development of this part of the site has been accepted. The southern part of the site is presently the New Zealand Golf Club. This is not a local amenity and there are other golf courses available.

The site is more that large enough to provide land for the 1000+ house needed. The site could also provide space for schools, health, leisure, sports and other amenities. Employment sites can be allocated. Road links to the M25 and West Byfleet and Woking stations are good.

The site has good transport links and can provide space to build local amenities not only for the housing built here but for this northern side of Woking which is currently short of capacity.

### **Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to

enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site

Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required

to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

In terms of the issues raised about the other sites proposed such as justification for the release of Green Belt land for the development, infrastructure and character, these issues have already been addressed in the 'Regulation 18 Consultation Issues and Matters Topic Paper', please refer to section 1.0 and 7.0 for the Council's response.

**Contributor Reference:** 00715/1/001  
**Customer Name:** Mr Peter Spreckley

**Summary of representation:**

Supports the use of the land east of Martyrs Lane in preference to the sites listed in the consultation document, particularly those in Mayford and Hook Heath, which have previously been included in draft Site Allocation DPD's. The reasons set out in the consultations document that it lacks special character, its partial disuse/disrepair, and its proximity to transport links and to employment opportunities are agreed upon. In addition, this large compactly-shaped site should make it possible to provide both an attractive place for a good number of people to live, and a green perimeter zone which both minimises any impact of the development beyond its boundary and enhances the pleasure of living there. This would be much more difficult, to achieve on smaller sites, particularly those on sloping ground.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council will make it an essential requirement for the site to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

**Contributor Reference:** 00724/1/001

**Customer Name:** Dr Jan Whitby

**Summary of representation:**

The traffic Surrey-wide is becoming intolerable. To add even more cars to the road leading both the M25 and the centre of Woking would make most drivers' already difficult journeys even worse. The local infrastructure is also unfit for purpose. The average time for an appointment at my GPs is 6 weeks. The school of choice may not always be open to parents. Parking on roads is ever more challenging.

To add to an already overburdened social infrastructure would make Woking a less attractive place to live.

**Officer Response:**

In terms of local traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

If a Planning application did come forward for the site the Council's Parking standard document would be complied with to ensure there would not be a proliferation of on street parking.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of infrastructure, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a

development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, GPs, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account. Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal.

**Contributor Reference:** 00750/1/001  
**Customer Name:** Mr Alan Smith

**Summary of representation:**

Opposed to sign Green Belt land for development as it is contrary to the original reason for the Green Belt. It is impractical to use Byfleet due to the lack of infrastructure, flood plains, difficulty in obtaining medical appointments, insufficient school places and traffic congestions. These proposals to build on Green Belt must be rejected and the Council should exhaust brownfield sites. The existing previously developed sites at Broadoaks must be the limit of green belt usage.

**Officer Response:**

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Consultation issues and matters topic paper. The matters regarding infrastructure, flooding, traffic, medical centres and brown field sites are also addressed in the 'Regulation 18 Consultation issues and matters topic paper', with particular reference to section 1.0, 3.0, 5.0, 11.0, U and M.

As part of preparation of the Draft Site Allocation DPD, 125 alternative sites were assessed. The assessment is set out in the Sustainability appraisal, based on this and other evidence including the Green Belt Review, the most sustainable sites were put forward for the Draft Site Allocation DPD.

The representation is not clear to what site it is referring to. Nevertheless, there is the opportunity at Regulation 19 Consultation to recommend sites not currently allocated by the Council.

**Contributor Reference:** 00978/1/001  
**Customer Name:** Ms Shelley Doran

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00684/1/001  
**Customer Name:** Ms Nicola Dempsey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00685/1/001  
**Customer Name:** Mr Michael Lemon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00686/1/001  
**Customer Name:** Mr Bob Charrett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00687/1/001  
**Customer Name:** Mr Animesh Raval

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00746/1/001  
**Customer Name:** Mr Adrian Spencer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00747/1/001  
**Customer Name:** Ms Judith Spencer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00748/1/001  
**Customer Name:** Ms Claudia Spencer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00749/1/001  
**Customer Name:** Ms Samantha Ball

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00751/1/001

**Customer Name:** Nicole

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00752/1/001  
**Customer Name:** Ms Vera Restarick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00753/1/001

**Customer Name:** Ms Margaret Knight

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00754/1/001  
**Customer Name:** Mr Steven Pink

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00755/1/001  
**Customer Name:** Mr Richard Nicholls

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00756/1/001  
**Customer Name:** Mr Nick Gilchrist

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00757/1/001

**Customer Name:** Ms Bernadette Butler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00758/1/001  
**Customer Name:** Mr Matthew Windsor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00759/1/001  
**Customer Name:** Ms Sonya Nicholls

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00760/1/001  
**Customer Name:** Mr Peter Hambrook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00761/1/001  
**Customer Name:** Mr Simon Ridge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00762/1/001

**Customer Name:** Erin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00763/1/001

**Customer Name:** Mr Matt Reed

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00962/1/001  
**Customer Name:** Mr Stephen Brialey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00963/1/001

**Customer Name:** Mr Kevin Compton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00964/1/001  
**Customer Name:** Ms Val Cunningham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00965/1/001

**Customer Name:** Ms Patricia Freeman-Cramp

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00966/1/001  
**Customer Name:** Mr Peter Cramp

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00968/1/001  
**Customer Name:** Ms Kathy Eastgate

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00969/1/001  
**Customer Name:** Ms Marzena Michalska

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00970/1/001

**Customer Name:** Mr Michal Michalski

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00971 /1 /001

**Customer Name:** Safina Nazir

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00972/1/001

**Customer Name:** Mark

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00974/1/001  
**Customer Name:** Ms Susan Ward

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00975/1/001  
**Customer Name:** Mr Alan Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00976/1/001  
**Customer Name:** Mr And Mrs Moon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00977/1/001  
**Customer Name:** Ms India Multani

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00727/2/001  
**Customer Name:** Mr Michael Beehag

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00737/1/001  
**Customer Name:** Ms Carol Chase

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00738/1/001  
**Customer Name:** Mr Raymond Northwood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00708/1/001

**Customer Name:** Ms Hannah Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00709/1/001  
**Customer Name:** Ms Caroline Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00710/1/001  
**Customer Name:** Mr David Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00711/1/001  
**Customer Name:** Mr George Wayne Bull

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00712/1/001  
**Customer Name:** Ms Stephanie Plowright

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00713/1/001  
**Customer Name:** Mrs Sue Jackson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00714/1/001  
**Customer Name:** Mrs Olive Rafferty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00716/1/001

**Customer Name:** Ms Jo Caffry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00717/1/001  
**Customer Name:** Mr D G Barrett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00718/1/001  
**Customer Name:** Mrs I L Barrett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00719/1/001  
**Customer Name:** Ms Philippa Cheung

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00720/1/001  
**Customer Name:** Ms Delphine Palmowski

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00721/1/001  
**Customer Name:** Mr Philip Foster

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00722/1/001  
**Customer Name:** Mr Jeremy Perkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00723/1/001

**Customer Name:** Mr Toby West

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00725/1/001  
**Customer Name:** Mr Gareth Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00726/1/001

**Customer Name:** Mr Nick Lawry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00727/1/001  
**Customer Name:** Mr Michael Beehag

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00740/1/001  
**Customer Name:** Mr Matthew Hodges

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02677/1/001  
**Customer Name:** Ms Valerie Hive

**Summary of representation:**

Objects to the proposal for the following reasons:

- Taking of Green Belt;
- Endangering natural habitat and wildlife;
- Infrastructure;
- Traffic gridlock;
- Overcrowded health centres and hospitals;
- Over-subscribed schools;
- Road maintenance not good;
- Flooding;
- Urban sprawl with Fair Oaks;
- Only one hourly bus;
- More cars, lorries, vans etc.;
- More pollution;
- Higher noise levels.

An extra 3,500 houses would bring 5,000 extra cars, with further debris thrown from vehicles (e.g. cigarette butts), which contribute towards blocking drains.

The site would need yet further drainage improvements and the current pipe works are causing major disruption as it is.

**Officer Response:**

Objection is noted.

The majority of issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, including impacts on Green Belt and urban sprawl; impacts on wildlife; infrastructure provision; traffic implications; flood risk; public transport provision.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance, including the Fair Oaks Garden Village proposal. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. Partnership working with neighbouring boroughs continues as the Site Allocations DPD progresses, and the cumulative impacts of the Fair Oaks proposal will be a key

consideration that will be taken into account by Members in deciding which proposal is the most sustainable option.

Officers are satisfied that if the site is safeguarded it can be delivered without unacceptable risk to air quality. There is no declared air quality management area in the vicinity of the Martyrs Lane site, and the Council has robust policies to manage air quality impacts as a result of development. In particular, policy DM6: Air and water quality of the Development Management Policies DPD sets out strict air quality standards for development to meet. There are other policies such as DM5, DM7 and DM8 of the DPD that would apply to manage other sources of pollution as a result of development, such as noise.

The proposal is for the delivery of around 1,200 new homes. It is acknowledged that this would have impacts on the highway and the traffic implications are explained in more detail in the Topic Paper, as referenced above. It is true that a development of this scale would require different types of supporting infrastructure to be sustainable, such as improved drainage and water provision. The relevant infrastructure providers have been contacted as part of the consultation and their responses will be taken into account. Any potential disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 00683/1/001  
**Customer Name:** Ms Nicola McGinnis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00659/1/001  
**Customer Name:** Mr D R Hallett

**Summary of representation:**

Support the need to build more homes for present and future needs. One development seems more sensible than piecemeal extensions around the borough. Whilst the first proposal meets targets, it could result in too many add ons and become an annexe to Guildford. Support for the Martyrs Lane proposal and the concept of Goldsworth Park works very well with a strong community feel.

The Martyrs Lane site is big enough to accommodate 1200 houses, including affordable housing, and the necessary infrastructure of shops, primary schools, health centre, etc., without encroaching on the golf course. It will also simplify the process for obtaining planning permission. There is little development along the A320 north of Woking, making road widening relatively easy if necessary.

Although in the green belt, the site has no other national or local landscape designation unlike some of the other proposals. North of the golf course the land is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site, presumably because the land is suitable for development.

As it is a sizeable area it should be possible to build all the properties necessary, even if it subsequently turns out that more than 1200 are needed, or if there is a further requirement post 2040. The town centre is developing well as a commercial, retail and leisure area.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

Whilst the representation notes that the New Zealand Golf Course should be excluded from the site boundary, it should be noted that as part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other

constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation,

Sites of Special Scientific Interest or common land. The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD. Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected and indeed this is true for all the sites proposed.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00665/1/001

**Customer Name:** Mr Len Boyce

**Summary of representation:**

The unique nature of our town a mixture of green belt residential and non residential land should never be changed. Allowing this development and the development of Fair Oaks Airport will destroy the town. There is no need for these developments. However, there is a need for the green belt land to prevent traffic and over population. The current infrastructure including road and rail links are already extremely busy as can be seen by heavy traffic on the A320 and the trains which are full every day.

**Officer Response:**

In terms of protection of the Green Belt. The Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors

and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

In terms of infrastructure, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to quantify the transport and education provision needed to support the development and how they could be delivered. All other relevant infrastructure and utility providers are also consulted to help assess the infrastructure needs to support future growth. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;

- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of the railway, Network Rail, who is responsible for rail infrastructure, has also identified a number of capacity improvement projects along the Waterloo to Portsmouth Line. These projects are set out in the 'Wessex Route: Summary Route Plan' report which is available on the Network Rail website.

**Contributor Reference:** 00670/1/001  
**Customer Name:** Mr Neil Newton

**Summary of representation:**

Support the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 00655/1/001  
**Customer Name:** Mr Ben Martin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00656/1/001  
**Customer Name:** Ms Catriona Reed

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00657/1/001  
**Customer Name:** Mr Andrew Brundle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00658/1/001

**Customer Name:** Ms Julia Sirett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00660/1/001  
**Customer Name:** Ms Virginia Girtz

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00661 /1 /001

**Customer Name:** Mr And Mrs Nick And Susan Barney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00662/1/001  
**Customer Name:** Ms Heidi Eldridge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00663/1/001  
**Customer Name:** Mr Graham Sweeney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00664/1/001  
**Customer Name:** Mrs Ann Sweeney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00667/1/001  
**Customer Name:** Ms Katie Nash

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00668/1/001  
**Customer Name:** Mr Colin Richardson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00669/1/001  
**Customer Name:** Ms Helen Faulds

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00671 /1 /001  
**Customer Name:** Mr Jamie Hodges

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00672/1/001  
**Customer Name:** Mr H D Jenkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00673/1/001  
**Customer Name:** Ms Jo Davison

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00674/1/001  
**Customer Name:** Ms Hannah Maynard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00675/1/001  
**Customer Name:** Ms Gina Harrison

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00676/1/001  
**Customer Name:** Ms Diana Hannon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00677/1/001

**Customer Name:** Mr And Mrs David And Margaret White

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00678/1/001

**Customer Name:** Ms Gill Parry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00679/1/001  
**Customer Name:** Mr Nick Haynes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00680/1/001  
**Customer Name:** Ms Shirley Moody

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00682/1/001  
**Customer Name:** Ms Caroline Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00681/1/001  
**Customer Name:** Ms Susannah Hemmings

**Summary of representation:**

Major improvements to the existing infrastructure are needed to accommodate this huge number of homes, people and cars. This development is not sustainable. The roads, doctors, hospital and schools are already saturated as it is. The level of public services in Runnymede is currently not satisfactory and needs heavy investment.

**Officer Response:**

In terms of infrastructure such as the roads, doctors, hospital and school, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to quantify the transport and education provision needed to support the development and how they could be delivered. All other relevant infrastructure and utility providers are also consulted to help assess the infrastructure needs to support future growth. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

In terms of road congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of sustainability, the Council has carried out a Sustainability Appraisal (SA) to assess the environmental, economic and social implications of developing the site. The overall role of the SA is to ensure that the implications of developing the land and consequently of the Site Allocations DPD are managed to help achieve sustainable development. The outcome of the appraisal demonstrates that there are a number of negative, positive and neutral impacts for developing the site. The same Sustainability Appraisal Framework had been used to carry out a SA of the originally proposed six safeguarded sites. The SA Framework enables consistent information to be gathered to make comparative judgements between the sites. The Council therefore has significant information to inform decisions about the most sustainable site to safeguard for future development. It goes without saying that after balancing all the relevant factors, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

**Contributor Reference:** 00629/1/001  
**Customer Name:** Mrs Lorraine Dell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00631 /1 /001  
**Customer Name:** Ms Linda Sewell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00632/1/001  
**Customer Name:** Ms Tracey Handle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00634/1/001

**Customer Name:** Mr Jonathan Machin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00636/1/001  
**Customer Name:** Ms Anne Halls

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00611/1/001  
**Customer Name:** Ms Helen Golding

**Summary of representation:**

Opposed to all proposed development on Green Belt land within the Borough.

Particularly opposed to developments in Byfleet, because:

- Green Belt should be protected and shouldn't be developed on;
- Lack of infrastructure in Byfleet (school places, doctors etc) to accommodate hundreds of new homes;
- Flooding problems will worsen with additional dwellings being built;
- Roads around Byfleet/Brooklands are already severely congested and can't cope with hundreds more cars using them daily.

**Officer Response:**

Objection to using Green Belt land for development is noted. The Regulation 18 Issues and Matters Topic Paper sets out in detail the justification for the release of Green Belt land for future development in the Borough (Section 1) and for safeguarding Green Belt land to meet future development needs (Section 2). Section 3 explains how the infrastructure requirements of the sites – including the Byfleet sites – have been assessed and how adequate infrastructure would be secured (including transport infrastructure); Section 5 sets out how flood risk implications of the sites were assessed; and Section U addresses traffic concerns in more detail.

**Contributor Reference:** 00614/1/001  
**Customer Name:** Ms Christine Northrop

**Summary of representation:**

Supports the proposal as long as it doesn't encroach on the wooded areas around the six-cross roundabout roads and Horsell Common. Also believes the sites in Pyrford and Mayford should be safeguarded for future development.

**Officer Response:**

Support is noted. If the land were safeguarded for development and a planning application came forward, planning policy would require a full assessment of landscape, ecology, trees and other environmental assets to determine any potential impacts of the development. The design of the proposal would have regard to landscape features and designated sites such as Horsell Common. The Core Strategy and the Development Management Policies DPD contain robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD. It is likely that similar planning policies would be in place as part of any future Development Plan for the area, which would apply if the land were released for development.

Support for safeguarding of Pyrford and Mayford sites is also noted.

**Contributor Reference:** 00622/1/001  
**Customer Name:** Ms Wendy Lynam

**Summary of representation:**

Opposes the proposal to build more houses around the West Byfleet area, specifically in Woodham. The roads in this area are already congested and often at a standstill during peak hours. West Byfleet does not have the infrastructure to be able to cope with even more housing. Together with the proposals to build more flats in the centre of West Byfleet itself, and the Broadoaks proposals, the collective outcome will be even more heavy traffic in the area.

Woodham does not need any more housing. It will eventually be impossible to move freely around West Byfleet area.

**Officer Response:**

The Council is fully aware of local resident's concern about the existing traffic conditions on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including proposed sites in and around West Byfleet.

It would be simplistic to assume that the forecast trips generated from development of the six original safeguarded sites will be distributed across the borough whilst development at Martyrs Lane will concentrate all the traffic impacts on one heavily congested area (including roads around the West Byfleet area). The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concludes that the scale of the forecast highway impacts varies in each of the Green Belt development options tested. This is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both sets of development options are expected to exacerbate the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

The A320 is appropriately acknowledged to be affected whether development happens at Martyrs Lane or at the other six sites.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater.

The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 00625/1/001  
**Customer Name:** Mr Steve Hughes

**Summary of representation:**

Supports the proposal because:

- the Green Belt land in Pyrford is accessible and actively used by walkers, runners, cyclists and others from across the Borough;
- the heritage features of the area, which incorporates two Pyrford fields, includes the historic wooded grounds of Pyrford Court which are Grade II listed, Pyrford Village Conservation Area, Pyrford Common (designated as an SNCI), Aviary Road Conservation Area, and the network of ancient footpaths. The two fields in Pyrford are integral to the heritage setting of the area.

**Officer Response:**

The merits of the proposal as set out in the representation are noted and will be considered by Members.

It should be noted that Policy CS17 of the Core Strategy supports the protection and enhancement of physical access, including public rights of way to open space and green infrastructure. Any development coming forward on allocated sites would be encouraged to improve the quality and quantity of the Green Infrastructure network as part of the planning application process.

Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD include robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage or biodiversity assets of the area.

Section 19 of the Regulation 18 Consultation Issues and Matters Topic Paper addresses the issue of whether the proposals – including those in Pyrford – will have adverse impacts on the heritage assets of the area, and Section 23.0 addresses the representation regarding the impact on local character. Section J addresses the impact of future development on wildlife and biodiversity.

**Contributor Reference:** 00627/1/001

**Customer Name:** Ms Sally Pugh

**Summary of representation:**

Disagrees with the proposal for the following reasons:

1. Destruction of Green Belt;
2. Flood risks of the site and surface run off adding to flood risk;
3. Proximity to Horsell Common SSI and SPA;
4. Loss of recreational open space (destruction of golf course);
5. Pressure on traffic A320 and Woodham Road;
6. Concentration of development. A spread across other sites will better cope with integration.

**Officer Response:**

Objection to the Martyrs Lane Site is noted. The representations regarding Green Belt, flooding and traffic have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The sites' proximity to the Horsell Common Thames Basin Heaths SPA and SSSI is noted. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

The Council acknowledges that any future development on land to the east of Martyrs Lane may result in the loss of recreational open space (ie. the golf course). It should be noted that planning policy in the Core Strategy permits the loss of open space where it can be demonstrated that an alternative and equivalent or better provision is made available in the vicinity, or the development is directly related to the enhancement of the open space. Any planning application coming forward for development at the site would need to take this into account. As part of this consultation, Sport England has been consulted on the proposal and their representation and the Council's response can be accessed for further information.

**Contributor Reference:** 00630/1/001  
**Customer Name:** Mr Stephen Cardis

**Summary of representation:**

Supports the proposal (subject to achieving high quality, sustainable development and satisfying access and traffic concerns) for the following reasons:

- The sites previously identified were subject to significant objections.
- The scattered nature of the multiple sites would have impacted adversely on their proposed locations.
- There was limited opportunity to provide significant new infrastructure to support the multiple sites – they were essentially large housing estates.
- The proposal provides the opportunity to create a new community with its own identity and character and with a mix of tenures and house types.
- The scale of the allocation also indicates the potential for significant new infrastructure to support the development. The Government is proposing a series of Garden Villages around the UK and this is one concept that should be considered for this area.
- Woking Council should consider allocating as much land as possible for Self Build which has the potential to provide young people opportunities to house themselves at much lower costs than traditional new building by developers.

Clearly any development of the scale proposed would have significant impacts on the local road network and early consideration should be given to minimise such impacts and to identify improvements required and funding mechanisms. Would also need to consider how a replacement site for the waste facility would be secured.

Woking has a good reputation for promoting sustainable development and this are presents an opportunity to innovate and achieve an outstanding form of development that sets new standards for such a development.

**Officer Response:**

The merits of the proposal as set out in the representation are noted and will be weighed in the balance of considerations by Members.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The scale of development at the six original sites would also facilitate the improvement of existing or provision of new infrastructure.

The Council are aware of how the Government is supporting proposals for garden villages, and should the land be chosen to be safeguarded for future development this will be considered when drafting the next stage of the DPD.

The Council has recently adopted its Development Management Policies DPD which includes a planning policy on self-build and custom-build houses (DM12). This policy provides in-principle support for these development proposals where they comply with all other relevant policies of the Development Plan. The Council is currently assessing the level of need for these homes in the Borough through the Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment. The Council will consider allocating land for these types of homes based on this evidence.

The Council has carried out several studies to quantify and forecast vehicular trips and distribution that would be generated by various development options, including that at Martyrs Lane. The studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council would certainly aim to achieve a high standard of development at all of the proposed sites. Any development coming forward would be expected to comply with planning policy on sustainable construction which sets out standards for energy and water efficiency (currently CS22), and planning policy on design to achieve high-quality sustainable construction standards (currently CS21).

For information, Surrey County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs. The Council is committed to working with the mineral and waste authority as well as the relevant landowners on this matter should the Council decide to safeguard the site for future development needs.

**Contributor Reference:** 00633/1/001

**Customer Name:** Mr Jim Wallis

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future development needs of the borough between 2027 and 2040.

**Officer Response:**

Support noted

**Contributor Reference:** 00635/2/001  
**Customer Name:** Ms Hilary Davison

**Summary of representation:**

Objects to the scale of development in all proposals. There are too many houses planned for the network of roads, school services etc. in the area.

**Officer Response:**

Objection to development proposals is noted.

The case for allocating sites to accommodate future housing need is set out in detail in the Regulation 18 Issues and Matters Topic Paper.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses this issue in detail.

**Contributor Reference:** 00645/1/001  
**Customer Name:** Ubhayapriya Wijetunge

**Summary of representation:**

Woking is struggling to cope with traffic at the moment and this proposal would make matters worse, and decrease the quality of life in the Woking area.

**Officer Response:**

Objection noted. The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The Council has conducted a series of studies to assess the likely impacts of development at all of the allocated sites on transport infrastructure. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development. Further detail on traffic implications of the proposal is provided in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 00586/1/001  
**Customer Name:** Mr Peter Alfred

**Summary of representation:**

Works nearby and would be able to walk to work if living nearby.

**Officer Response:**

Support noted

**Contributor Reference:** 00589/1/001  
**Customer Name:** Ms Catherine Miller

**Summary of representation:**

The area could be considered as a suitable alternative/substitute and offers some advantages over other areas.

**Officer Response:**

Support noted

**Contributor Reference:** 00598/1/001  
**Customer Name:** Mr John Fawcett

**Summary of representation:**

The proximity of the proposed alternative site at Martyr's Lane to the SSSIs and SPAs around Horsell make this substitution less agreeable. Nature should be protected. The pressure this development in such close proximity to these designated areas will pose a threat to the nature conservation on those zones. The increase in local population will almost certainly mean an increase in persons visiting the conservation areas, especially when added to the proposed development on the Fair Oaks airport site. People have to live somewhere but so do wild animals, some of which are already threatened with extinction due to loss of habitat.

**Officer Response:**

The Council recognises the proximity of the site to nearby protected sites for nature conservation. Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land, and nearby land, can be protected. The representations of these organisations, and the Council's response, can be accessed for more information.

It should also be noted that any planning application for development at the site would be assessed against the Development Plan for the area at the time, which would include policies to conserve and protect biodiversity assets and designated sites from any adverse impacts.

**Contributor Reference:** 00600/1/001

**Customer Name:** Mr And Mrs Vernon And Jill Cornell

**Summary of representation:**

Support the proposal. If necessary to build on the Green Belt, this proposal offers the most practical solution, being large enough to accommodate all the dwellings needed in one place. There would also be room to provide the associated infrastructure, thus avoiding overloading existing facilities adjoining the alternative small dispersed sites. Apart from the golf course, this site is largely derelict and unused and has no special landscape or scientific restrictions on it.

Other positive reasons for choosing this site are:

1. The proximity of at least three large employers within easy reach and any neighbourhood centre would provide further employment.
2. Access to the town centre, bus, rail, road and cycle links are already in place. If necessary it would be possible to widen the A320 north of Woking as there is very little development along it and no railways to negotiate. This is not the case south of the town where the A320 is very congested at peak times and will become more so when the new Hoe Valley school opens. Other roads south of Woking are already heavily used as "rat runs".

With suitable protection for existing properties and boundaries, the proposal would offer the best solution.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land, whether it is at Martyrs Lane or the six originally proposed sites. Section 106 contributions will also be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered.

The Council has carried out a series of separate studies to quantify and forecast transport impacts of the different development scenarios. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites. The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Whilst the bus services might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

**Contributor Reference:** 00602/1/001  
**Customer Name:** Mr Barry Scrivner

**Summary of representation:**

The site is large enough to accommodate 1200 private and affordable homes, Traveller accommodation and the necessary social and community infrastructure needed to support it. There are advantages to one new large estate than several dispersed small ones as it is easier to create the necessary infrastructure.

It is easier to obtain planning permission.

There are major employers in close proximity and a new neighbourhood centre would provide additional employment opportunities.

The A320 provides easy access to the M25 and Heathrow Airport as well as Woking Town Centre and Station. Bus and cycle routes into Woking also already exist. The A320 to the south of Woking is already at capacity even before the Hoe Valley School has opened.

Road widening of the A320 north of Woking would be easy if necessary.

Although Green Belt, the site has no other national or local landscape designation unlike some of the other proposals.

Most of the site is within Flood Zone 1 and therefore make the planning and development process simpler and more cost effective.

The northern part of the site is largely disused and derelict and planning permission has previously been given for McLaren to build a technical centre on part of the site. There is therefore a presumption that the land is suitable for development.

Masterplanning of the site would allow for the provision of affordable housing which is needed in the Borough as the Council is currently not meeting its targets. The site would also be able to accommodate specialist residential accommodation for older people and vulnerable groups.

The site could provide Gypsy and Traveller accommodation for those wishing to live in the east of Woking. All sites are currently in the southwest of the borough. This would also meet the requirements of Policy CS14 and meet Woking's current and future Traveller accommodation needs. Ten Acre Farm can therefore be removed as a Traveller site proposal.

The size of the site means additional housing can be built if more than 1200 is needed, either between 2027 and 2040 or post 2040.

A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support for the Martyrs Lane site is noted.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and

- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Development at either the Martyrs Lane site or the other six sites would be directed to land designated as Flood Zone 1 as defined in the Council's Strategic Flood Risk Assessment. The planning process and development management process in this regard would be similar for development at any of the proposed sites.

Regarding the representation on landscape, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape references made in the representation. Detailed analysis and reasons for this recommendation are set out in the report. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

Additionally, the Peter Brett report assesses the land east of Martyrs Lane within parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all

assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

It is acknowledged that part of the site was granted planning for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government's policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is a single site or multiple sites.

At the Regulation 18 stage, Officers had recommended to Council that the need for Traveller accommodation should be met at Five Acres and Ten Acres and the need as determined in the TAA is 19 pitches up to 2027. At the Council meeting, Members had requested that officers revisit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 consultation, Officers' accordingly are investigating this matter and will be reporting to Council in due course.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 00607/1/001  
**Customer Name:** Mr Derek Hancock

**Summary of representation:**

Whilst the priority should always be to explore brown field sites first, the proposed option would seem to be the lesser of two evils. Much of the proposed land is a golf course, and there are several other courses in the area. Concentrating development in the one area would also lessen the impact on some of the surrounding villages who want to retain their character. In particular, the lanes around Mayford would seem unsuited to new development.

**Officer Response:**

Support for the proposal is noted.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail how the Council first assessed the capacity of the urban area (and brownfield sites) to accommodate the housing requirement of the Borough, and then identified land in the Green Belt – see Section 1.

The Paper also addresses the issue of new development affecting the character of local areas where the original sites were proposed – see Section 23, and Sections F, Q and V which specifically refer to impacts on Mayford (including impacts on transport infrastructure in Mayford).

**Contributor Reference:** 00649/1/001  
**Customer Name:** Mr David M Brighton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00650/1/001  
**Customer Name:** Robin I Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00651/1/001  
**Customer Name:** Ms Angela Henry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00652/1/001  
**Customer Name:** Mr Andy Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00653/1/001  
**Customer Name:** Mr M F Thirlwall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00654/1/001  
**Customer Name:** Ms Sarah McGough

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00641 /1 /001  
**Customer Name:** Mrs Linda Parratt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00642/1/001  
**Customer Name:** Mr Jason Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00644/1/001  
**Customer Name:** Ms Amy Lambkin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00646/1/001  
**Customer Name:** Ms Charlotte Regan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00647/1/001  
**Customer Name:** Ms Clare Claxton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00648/1/001  
**Customer Name:** Mr Nick Claxton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00637/1/001  
**Customer Name:** Ms Tracey Stanley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00638/1/001  
**Customer Name:** Ms Esme Boylett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00639/1/001

**Customer Name:** Ms Jill Hayter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00640/1/001  
**Customer Name:** Ms Laura Housden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00585/1/001  
**Customer Name:** Mr Ashley Pember

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00587/1/001

**Customer Name:** Ms Sabrina Fragassi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00588/1/001  
**Customer Name:** Mr Colin Duncan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00590/1/001  
**Customer Name:** Mr John R Cockerill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00591/1/001  
**Customer Name:** Mr David Billig

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00592/1/001  
**Customer Name:** Mrs Mary B Cockerill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00593/1/001

**Customer Name:** Mr Nick Arbin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00594/1/001

**Customer Name:** Stacey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00595/1/001  
**Customer Name:** Ms Donna Broom

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00596/1/001  
**Customer Name:** Ms Janet Willetts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00597/1/001

**Customer Name:** Jabie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00599/1/001  
**Customer Name:** Ms Sally Parratt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00601/1/001  
**Customer Name:** Ms Hannah Parratt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00603/1/001

**Customer Name:** Mr John Nett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00604/1/001  
**Customer Name:** Ms Linda Pember

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00605/1/001  
**Customer Name:** Mr James Crotty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00606/1/001  
**Customer Name:** Ms Stephanie Cutts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00608/1/001  
**Customer Name:** Mr Daryl Hogben

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00609/1/001

**Customer Name:** Aruna Milson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00610/1/001  
**Customer Name:** Henny Dovland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00612/1/001  
**Customer Name:** Mr Maurice Rubin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00613/1/001  
**Customer Name:** Ms Amy Maher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00615/1/001  
**Customer Name:** Mr William Howard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00616/1/001  
**Customer Name:** Mr Jamie Wood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00617/1/001  
**Customer Name:** Mr Stuart Belcher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00618/1/001  
**Customer Name:** Ms Annie Wade

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00619/1/001  
**Customer Name:** Mrs Jane Boylett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00620/1/001  
**Customer Name:** Mr Martin Leigh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00621 /1 /001

**Customer Name:** Mrs P Leigh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00623/1/001

**Customer Name:** Anel Lamine

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00624/1/001

**Customer Name:** Mr Terry Dell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00626/1/001

**Customer Name:** Ms Sian Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00628/1/001  
**Customer Name:** Yousra El Badawi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00561/1/001  
**Customer Name:** Mr Jack Morgan

**Summary of representation:**

General in principle support for development in Woking, especially in Woking town centre.

There is a huge demand for housing in the area, including social and affordable housing. However objects to the loss of woodland and biodiversity. Many of the sites identified include the loss of woodlands and habitats.

These areas should be protected to keep a clear boundary, separate and identity away from the urban sprawl of London.

Has some sympathy for building on fields or farmland, such as Brookwood farm, as long as effort is made to maintain the trees and habitats in the area.

Preference would be to build up with more tall buildings such as Victoria square which allow a greater density of people without affecting nature. Would recommend any development in the town centre is limited to a minimum of 4 storeys, to maximise the land.

Especially object to the land around Martyrs Lane being used for housing because there are plenty of other suitable sites to develop first, and to destroy a woodland area for more low density housing isn't the solution.

The infrastructure of the area needs to be improved. Woking is disconnected from the primary road network and most main roads are single carriageways. They are often congested.

Suggests a bypass from Goldsworth Park to the A319 near Lightwater/Gordons School to improve the route from Woking to the M3. Routes to the A3 and M25 could also be improved by building more roads and widening existing ones. Although not a borough council matter it is required. Woking Train Station also needs to be improved, with extra platforms added, to improve capacity not only here but on the entire South West network. Objects to a rail overpass avoiding the town.

Supports the land to the east of Martyrs Lane being used for McLaren to extend their business activities as large companies such as them should be a priority to attract other large companies to the town.

**Officer Response:**

Support for the Martyrs Lane site for McLaren operations is noted.

The draft Site Allocations DPD, published in 2015, identified 75 sites for both development and public open space across the Borough. As set out in the document the majority of the sites

identified for development are located in Woking town centre as it offers the best accessibility to existing services and facilities. This approach is supported by the Woking Core Strategy, in particular Policy CS1: A spatial strategy for Woking Borough and Policy CS2: Woking Town Centre. Nevertheless it is important to note that the town centre is unlikely to deliver the mix of housing that is needed within the borough, in particular family sized housing. The specific housing mix required in the borough is set out in the Strategic Housing Market Assessment as well as Core Strategy Policy CS11: Housing mix.

Regarding the representation on woodlands, the Council is aware of the existing designated Ancient Woodland towards the northern end of the Martyrs Lane site. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss. Any surveys of the site, undertaken at the development management stage, will make sure that important trees and other environmental and amenity features of significance are fully assessed and protected from development, where necessary.

The representation on wildlife and habitats has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper.

The representation on urban sprawl and road infrastructure and congestion has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA.

During the preparation of the Site Allocations DPD, the Council considered about 125 alternative sites as part of the site selection process. The full list of sites can be found within the Sustainability Appraisal (SA). The SA is objective-led and has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. It also sets out why sites have either been selected or rejected. More information on this process as well as the Council's assessment of brownfield sites is set out in the Regulation 18 consultation Issues and Matters Topic Paper.

As set out in the draft Site Allocations DPD, the Council is seeking to allocate Woking Train Station for essential infrastructure improvements (see site UA23). This includes a separated railway flyover to increase capacity on the rail network. This proposal is not anticipated to reduce the number of trains stopping at Woking Station. The Council is committed to working with the railway operator and Network Rail in delivering these improvements.

**Contributor Reference:** 02674/1/001

**Customer Name:** Mrs A Dicker

**Summary of representation:**

Objects for the following reasons:

- removal of Green Belt is so sad, and how it effects wildlife;
- roads are getting more and more congested, especially with motorway so near. Traffic will become worse, particularly with Longcross and Fair Oaks proposals nearby;
- lack of services - would need another hospital, doctors, schools, local shops;
- main piping and drainage cannot take any more pressure as they haven't been renewed since they were first laid, which will lead to flooding.

**Officer Response:**

Objection is noted and will weigh in the balance of considerations by Members.

The main issues raised in the representation are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, including impacts on the Green Belt and its wildlife; traffic implications of the proposal; infrastructure and service provision; and impacts on flood risk.

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00566/1/001  
**Customer Name:** Ms Barbara Baty

**Summary of representation:**

The site is not in close proximity to local services and transport so development would require costly infrastructure such as schools, shops and medical services. By spreading housing across several parts of the Borough, existing services could be used and this would spread the load on transport and other infrastructure.

The possible development at Fair Oaks is in close proximity and would increase urbanization of the green landscape.

The land around Martyrs Lane floods frequently and development would increase surface runoff and flooding.

There are areas of woodland within the site and contain a range of wildlife, that are protected species. These sites should be protected not developed.

Traffic is already a major problem in the area as is rat running on residential roads. Heavy traffic on the A320 has led to sinkholes because of the underlying soil structure. Development at this scale would overload these important access roads.

**Officer Response:**

The comments set out in the representation have been noted. The Council has addressed these specific issues individually in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper. This includes infrastructure provision, roads and congestion, urban sprawl, flooding, wildlife, woodlands and sinkholes.

**Contributor Reference:** 00550/1/001  
**Customer Name:** Mr Daniel Berry

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 00045/2/001  
**Customer Name:** Mr David Thorne

**Summary of representation:**

Support the objections made by the Mayford Village Society against development in Mayford. The arguments against development in Mayford remain unchanged.

**Officer Response:**

Objection to development in Mayford is noted. The Council has previously addressed the representation made by the Mayford Village Society in respect of the Regulation 18 consultation. This can be found on the Council's website. A number of the issues raised in the Mayford Village Society response has also been addressed in the Issues and Matters Topic Paper, which is also available on the Council's website.

**Contributor Reference:** 00553/1/001

**Customer Name:** Mr Terry Daly

**Summary of representation:**

Support the proposal to safeguard land at Martyrs Lane for future development needs.

The site has previous development and is more easily accessed by major roads.

The Pyrford Green Belt offers substantial views towards the Surrey Hills and is used for recreational purposes.

The long term future of the Green Belt outweighs the loss of the New Zealand Golf Course. Existing members could use the wide range of other golf courses locally.

**Officer Response:**

Support for the site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027);
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. This is a decision the Council will take when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it would be wrong to assume that development at Martyrs Lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any

development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the Pyrford sites as set out in the representation are noted and will weigh in the balance of considerations by Members. It should be noted however that points raised in the representation regarding the two Pyrford sites have already been addressed by the Council in the Regulation 18 consultation Issues and Matters Topic Paper which is on the Council's website.

Whilst there are a number of other golf courses located within Woking Borough, any proposed development of the site would be required to be in general conformity with the Development Plan for the area and this would be taken into account at the Development Management stage.

The purpose of the consultation is to ensure that the proposed allocations and or any other preferred alternatives are the most sustainable when compared against other reasonable alternatives.

**Contributor Reference:** 00557/1/001  
**Customer Name:** Mr Graham Marshall

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 00560/1/001  
**Customer Name:** Ms Denise Harding

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD and objects to using the sites proposed in Pyrford.

**Officer Response:**

Support for the Martyrs Lane site and objection to the Pyrford sites is noted.

**Contributor Reference:** 00446/2/001  
**Customer Name:** Mr Steve Messenger

**Summary of representation:**

The northern section of the site owned by McLaren could be used for housing and would be sustainable.

The site area set out in the consultation document is too large for the road infrastructure to cope with and would have a significant impact on the local environment and inappropriate given the already large development of Sheerwater.

**Officer Response:**

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- Woodham Court (SHLAAHEW006);
- Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Nevertheless the Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The representation relating to road infrastructure has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. In addition, any environmental implications will be fully assessed as part of the development management process and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid

unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

The Sheerwater regeneration scheme has been granted planning permission for a comprehensive redevelopment of the site. The full impacts of the proposals, including those on the natural environment, the road network and social and community infrastructure were fully assessed at the Development Management stage when the application was being determined. If the Council safeguards the land to the east of Martyrs Lane for future development needs then it would also be required to assess the impacts of development and set out mitigation measures if required.

**Contributor Reference:** 00567/1/001  
**Customer Name:** Mr Michael Bennett

**Summary of representation:**

The Martyrs Lane site is an ideal location for safeguarding with good transport links and open space.

**Officer Response:**

Support for the Martyrs Lane site and the merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation on open space, to ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS17: Open space, green infrastructure, sport and recreation, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

**Contributor Reference:** 00568/1/001  
**Customer Name:** Mrs Susan Chester

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

The Pyrford sites are used for recreation purposes and is rich in wildlife.

The land has been farmed for many years and should be preserved.

Development in Pyrford would result in a large housing estate with poor infrastructure and the village heritage would be lost.

The Martyrs Lane site is close to a main road, not used for recreational purposes and not in an attractive area.

**Officer Response:**

Support and the merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

The representation regarding the merits of the two sites in Pyrford is noted. The Council has previously responded to these comments during the Regulation 18 consultation. The Council's response can be found in the Regulation 18 consultation Issues and Matters Topic Paper.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that these particular sites are of low soil quality.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It would be incorrect to imply that the Martyrs Lane site is not used for recreational purposes. The site currently contains Woodham Court, which is a small sports facility, as well as the New Zealand Golf Course. Sport England has been consulted as part of the consultation process and their comments will be considered by the Council when making a decision on its preferred approach to safeguarding.

Regarding landscape quality, the Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

Based on the outcome of the two studies, Officers broadly accept that the development of the land east of Martyrs Lane as envisaged in the consultation document will lead to a degree of urban sprawl and a significant incursion into the Green Belt.

The Peter Brett report assessed the land east of Martyrs Lane (identified within Parcel 2 of the report) and concluded that it has low suitability for removal from the Green Belt. There is potential for development to lead to the perception of merging with development on the part of the site owned by McLaren. The parcel of land has 'strong character with extensive woodland which contributes to enclosure and defines the northern setting of Woking. The land has limited capacity to accommodate further significant development without significant adverse effects on important landscape features and prevailing strong character'.

The Hankinson Duckett Associates report specifically assessed the land east of Martyrs Lane against the purposes of the Green Belt. Its conclusions are broadly similar to the Peter Brett's report. The land is critically important in its contribution towards the purposes of the Green Belt. In particular, it concluded that the land has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging, but the Bourne River and associated flood zone to the north of the site acts as a very strong durable boundary in preventing encroachment beyond that point.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt. Both documents are available to view on the Council's website.

**Contributor Reference:** 00583/1/001  
**Customer Name:** Ms Zoe Newman

**Summary of representation:**

Development would cause further congestion on the A320 to the M25. It is also the main route to St Peters Hospital and congestion at this scale would impact ambulance response times and time taken for them to get to A and E.

**Officer Response:**

This representation regarding the existing road network and congestion has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

In addition, the Council is seeking to work with the Clinical Commission Groups and other healthcare providers to see how well provision could be aligned to proposed developments to avoid unacceptable standards of provision in the area.

**Contributor Reference:** 00563/1/001  
**Customer Name:** Ms Joan Ashley

**Summary of representation:**

Part of the site has been granted planning permission in the past and there is considered suitable for development.

The site has excellent road links to the M25 and Heathrow Airport as well as Woking and Guildford where there are mainline train stations.

The site is large enough to accommodate new social and community infrastructure unlike the other six sites which would stretch existing infrastructure.

A larger site would mean more affordable housing which is needed in the Borough and provide specialist residential accommodation.

There are good employment possibilities in the area.

The site has no local or national landscape designation other than Green Belt.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

It is correct that a part of the site has been previously granted planning permission for a car production facility associated with McLaren Technologies. The merits of that particular employment proposal were considered at the time and deemed to meet the tests of very special circumstances for development in the Green Belt. McLaren have made representations to this consultation to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

Nevertheless the Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the

Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Regarding the representation on the existing road infrastructure, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

There appears to be no clear advantage between this site and the other six sites identified in the draft Site Allocations DPD in relation to proximity to Guildford and Guildford Station.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Whilst any of the proposed safeguarded sites could accommodate specialist residential accommodation, this would only be considered during a review of the Core Strategy and or Site Allocations DPD.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The representation regarding landscape designation is noted and taken into account. The Peter Brett report (Green Belt Boundary Review) however does not recommend that the Martyrs Lane site is allocated for development. It reaches this conclusion after acknowledging the references made in the representation. The above evidence should be the basis upon which the Council should make its judgment about how the site east of Martyrs Lane compares with the six sites.

**Contributor Reference:** 00565/1/001  
**Customer Name:** Mrs Jenny Velati

**Summary of representation:**

Objected to the development of the Hoe Valley School on Egley Road, particularly to the sports facilities on Green Belt land. This will have significant traffic implications for this part of the Borough.

Additional housing on Saunders Lane will be out of keeping with the local character and also have a negative impact on the road network as most residents have at least 2 cars.

Ten Acre Farm is already in close proximity to the Traveller site on Burdenshott Road and therefore there is no need for an additional site so close by.

Objects to the principle of Green Belt development and priority should be given to brownfield sites. Nevertheless Martyrs Lane is more appropriate given the location and size of the land as well as the extra facilities that have been suggested.

**Officer Response:**

The representation regarding the sites on Egley Road, Ten Acre Farm and Saunders Lane, identified in the draft Site Allocations DPD is noted. These have been addressed previously by the Council and the response can be found in the Regulation 18 consultation Issues and Matters Topic Paper. This is available on the Council's website.

In addition, the above report sets out the Council's reasoning for identifying land within the Green Belt to meet development needs, both during this plan period and for future development needs between 2027 and 2040. It also sets out the Council's approach to assessing existing brownfield land in the Borough and the evidence base documents that support the Council's policies.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

Whilst it is correct that the Martyrs Lane site is of a significant size, McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs.

Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Regarding the representation on extra facilities, the Martyrs Lane consultation is to the possibility of substituting it for the six sites identified in the Regulation 18 Site Allocations DPD and that the site could deliver at least 1,200 net additional homes and the necessary green and other infrastructure to support the potential development of the site. For information, the Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 00552/1/001  
**Customer Name:** Mr Richard Sharp

**Summary of representation:**

All green belt land is important.

The existing infrastructure, including roads, hospitals, doctors surgeries, schools are at capacity.

Because of all the planning possibilities, we will move away from the area soon.

**Officer Response:**

The justification for the release of Green Belt land for the development has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper'.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 00554/1/001  
**Customer Name:** Ms Jane Walton

**Summary of representation:**

Concerned that traffic is already heavy on the A320, largely because of McLaren.

An additional 3000 homes and the consequent increase in traffic in close proximity to the McLaren site will have an impact on the M25 making it unacceptably slow.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00564/1/001  
**Customer Name:** Ms Gwen Bailey

**Summary of representation:**

The main roads including A320 and Woodham Road can not cope with the additional traffic

**Officer Response:**

This issue has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00584/2/001  
**Customer Name:** Mr Jason Newman

**Summary of representation:**

Development here would ruin the character of the area and introduce a significant amount of traffic.

**Officer Response:**

It is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

With regards to comments about increased pressure on infrastructure, these issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00577/1/001

**Customer Name:** Mr Trevor Hill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00578/1/001  
**Customer Name:** Mrs Jacqueline Alderton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00579/1/001

**Customer Name:** Mr W Harmer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00580/1/001  
**Customer Name:** Mr Graham Moss

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00581/1/001  
**Customer Name:** Mr Cornelius Vosloo

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00582/1/001  
**Customer Name:** Mr Christopher Alderton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00546/1/001  
**Customer Name:** Ms Clare Charrett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00547/1/001  
**Customer Name:** Ms Helen Whittington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00548/1/001

**Customer Name:** Mr Brian Baty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00549/1/001

**Customer Name:** Mr L P Phipps

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00551/1/001  
**Customer Name:** Ms Rachel Reed

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00555/1/001  
**Customer Name:** Mr Martin Thurston

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00556/1/001  
**Customer Name:** Ms Debbie Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00558/1/001  
**Customer Name:** Ms Patricia Lord

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00559/1/001  
**Customer Name:** Ms Maureen Marshall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00562/1/001  
**Customer Name:** Mr Robert Day

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00569/1/001  
**Customer Name:** Mrs Veronica Lacey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00570/1/001

**Customer Name:** Dr Janie Palk

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00571/1/001

**Customer Name:** Mohindra

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00572/1/001  
**Customer Name:** Mr Reg Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00573/1/001  
**Customer Name:** Mr Clive Baker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00574/1/001  
**Customer Name:** Ms Sarah Maynard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00575/1/001

**Customer Name:** Levi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00576/1/001  
**Customer Name:** Mr John Haynes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02681/1/001

**Customer Name:** S R Woakes

**Summary of representation:**

Objects to the proposal of 1200 homes in Martyrs Lane. The development is far too large for the area and the increase number of cars would put a strain on the local roads.

**Officer Response:**

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00538/1/001  
**Customer Name:** Mr Stephen Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00511/1/001

**Customer Name:** Mr Dan Cefai

**Summary of representation:**

Supports a logical approach of a number of smaller sites spread across different locations in the area as opposed to one large development east of Martyrs Lane. This allows for a variety of locations and house types whereas building on one site poses the risk of a housing estate with no character.

The site is unsustainable with increased pressure placed on the road network, schools, GP etc.

**Officer Response:**

Support for a dispersed approach as oppose to one single site is noted.

It is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

With regards to comments about the sustainability of the site with increased pressure on infrastructure, these issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00515/1/001  
**Customer Name:** Mr Robert Rider

**Summary of representation:**

Objects to development of the Martyrs lane site on the grounds of lack of infrastructure.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00529/1/001  
**Customer Name:** Mr Paul Parsons

**Summary of representation:**

Supports development here because it is brownfield rather than greenfield which is considered far more suitable for development.

The road infrastructure in this area is better, an increase in road traffic will be much less damaging to existing local residents.

**Officer Response:**

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the

Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

**Contributor Reference:** 00506/1/001

**Customer Name:** Thomas Roberts Westminster Limited

**Summary of representation:**

The landowner of the site supports the proposed new strategy of substituting the previously proposed six safeguarded sites outlined in the draft Site Allocations Development Plan Document (DPD) with land to the east of Martyrs Lane as the preferred strategic 'safeguarded site' to meet the long term future housing development needs of the Borough between 2027 and 2040.

The site however is also currently identified under three separate policies (Policies WD1, WD2 and WD5) of the adopted Surrey Waste Plan (2008) as being suitable to accommodate waste management use.

**Officer Response:**

The Council notes the landowners support for the proposal to allocate the land to be safeguarded for future development needs. The Council also notes that the site is currently safeguarded in the Surrey Waste Plan (2008) and will continue to liaise with the Waste Authority on this matter if the Council decides that this site is its preferred safeguarded approach.

**Contributor Reference:** 00526/1/001  
**Customer Name:** Mr Craig Kimber

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 00527/1/001  
**Customer Name:** Mr Richard S Lawrence

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 02967/1/001  
**Customer Name:** Mr Steve Lawrence

**Summary of representation:**

Reasons for safeguarding Martyrs Lane instead of Upshot Lane fields:

The Pyrford sites are part of the heritage features of the area which includes conservation areas, ancient footpaths and listed assets. The two fields in Pyrford are integral to the heritage setting of the area.

The sites are protected by Policy CS24: escarpment and rising ground of landscape importance.

The sites have been farmed for centuries and include good quality agricultural land. These play an important contribution to the rural character of the area and gateway into the town. Loss of these 2 fields would make the remaining area of Ladyplace Farm less viable.

**Officer Response:**

The Council notes the representation outlining reasons against safeguarding land for future development needs in other areas of the Borough. This will be taken into account to inform the preferred approach to safeguarding.

The matters relating to heritage, landscape and local character have been addressed in Officers' Response to the Regulation 18 Site Allocations DPD consultation.

In addition, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA. Whilst the site identified as GB13 in the draft Site Allocations DPD is adjacent to Lady Place Farm, it is not clear from the representation how the safeguarding of these two sites for future development needs will have an adverse impact on the viability of the farm.

**Contributor Reference:** 00528/1/001  
**Customer Name:** Mr Matt Lothian

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

Some of the site is previously developed land unlike the other proposed sites.

The A245 through West Byfleet and over the M25 has no capacity left, especially when other new development in the area is taken into account.

One site would result in economies of scale and help to find solutions to the infrastructure concerns.

Green Belt land in Pyrford is accessible and used for recreational purposes.

The Pyrford sites are an integral part of the heritage setting of the area which includes listed assets, conservation areas and ancient footpaths.

The Pyrford sites have been farmed for centuries and include good quality agricultural land. They make an important contribution to the rural character of the area and gateway into the town.

All Green Belt land should be protected but if needed for future development needs, then the Martyrs Lane site is the better option.

**Officer Response:**

Support for the Martyrs Lane site is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Three areas of land within the site had been promoted to the Council previously and were all assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);

- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is

submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The merits of the land east of Martyrs Lane regarding economies of scale as set out in the representation are noted and will weigh in the balance of considerations by Members. Nevertheless to ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council notes the representation outlining reasons against safeguarding land for future development needs in Pyrford. This will be taken into account to inform the preferred approach to safeguarding.

The matters relating to heritage, local character and amenity have been addressed in Officers' Response to the Regulation 18 Site Allocations DPD consultation.

In addition, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The Pyrford sites are not classified as high quality agricultural land by DEFRA.

**Contributor Reference:** 00530/1/001  
**Customer Name:** Mr And Mrs Wally Rodgers

**Summary of representation:**

Supports the work of the Pyrford Green Belt Action Group

**Officer Response:**

Support for the Pyrford Green Belt Action Group is noted.

The representation made by the Pyrford Green Belt Action Group has been addressed separately by the Council.

**Contributor Reference:** 00533/1/001  
**Customer Name:** Mr Simon Bond

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 00543/1/001  
**Customer Name:** Mr Peter Graves

**Summary of representation:**

Agrees to the possibility of substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD.

**Officer Response:**

Support noted

**Contributor Reference:** 00534/2/001  
**Customer Name:** Mr Tim Hopkins

**Summary of representation:**

Concerns raised about flood risk, traffic and the impact on wildlife.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00541/1/001  
**Customer Name:** Mr Richard Crowther

**Summary of representation:**

Whilst the Martyrs Lane site is on Green Belt land, it is in part previously developed land, which makes it more suitable than the other proposed sites.

The Martyrs Lane site is closer to Woking Town Centre and conveniently located next to substantial road infrastructure and main transport links, with good road connections to Woking and the M25. There will be a less damaging affect on the feel of the area.

In contrasts the road network around Pyrford and West Byfleet are already heavily congested and poorly connected.

Land at Martyrs Lane is relatively unused by the local public (except the recycling facility- which has little amenity value). Appropriate and considerate construction should allow the development to be sensitively located within the wooded area.

Martyrs Lane is in a sustainable location, close to major employers.

The benefits of Martyrs Lane site are considered greater than the benefits than the other proposed sites including proximity of Woking, better transport links, part 'brownfield' redevelopment, and has a lesser impact on the character of the borough.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);

- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst there may be limited public access to much of the Martyrs Lane site, the Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

**Contributor Reference:** 00504/1/001  
**Customer Name:** Ms Jane E Foxon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00505/1/001  
**Customer Name:** Mr Mark Buckley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00507/1/001  
**Customer Name:** Ms Yvonne Osprey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00508/1/001  
**Customer Name:** Mr Philip Osprey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00509/1/001  
**Customer Name:** Ms June Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00510/1/001  
**Customer Name:** Ms Sally Simone

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00512/1/001  
**Customer Name:** Mr Simon Baluch-Jenkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00513/1/001

**Customer Name:** Mrs Hutt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00514/1/001  
**Customer Name:** Mr Geoffrey Gandy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00516/1/001  
**Customer Name:** Ms Mary Cuttle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00518/1/001  
**Customer Name:** Mrs And Mr Jan Stammer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00519/1/001

**Customer Name:** Mr Trevor Skidmore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00520/1/001  
**Customer Name:** Mr Paul Thornton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00539/1/001  
**Customer Name:** Ms Clare Hillier

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00540/1/001  
**Customer Name:** Mr Brian Hames

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00542/1/001  
**Customer Name:** Mr Gregory Conlon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00544/1/001  
**Customer Name:** Ms Hilary Osmon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00545/1/001

**Customer Name:** Ms Julia Platia

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00521/1/001

**Customer Name:** Mrs T Forbes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00522/1/001  
**Customer Name:** Mr Sean Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00523/1/001

**Customer Name:** Ms Sally Wells

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00524/1/001  
**Customer Name:** Mr Chris Wells

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00531/1/001  
**Customer Name:** Ms Carolyn Thornton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00532/1/001

**Customer Name:** Ms Lisa Hill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00535/1/001  
**Customer Name:** Mr Graham Wood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00536/1/001

**Customer Name:** Sam Kendall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00537/1/001  
**Customer Name:** Mr Geoffrey Cuttle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00525/1/001  
**Customer Name:** Horsell Common Preservation Society

**Summary of representation:**

Object to the proposal.

The site adjoins the Thames Basin Heaths Special Protect Area (SPA), which is accorded the uppermost environmental protection under European Union Directive. The SPA provides habitats for Dartford Warbler, Nightjar and Woodlark which are protected species of international significance. Policy NRM6 of the South East Plan emphasises that new residential development which is likely to have significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England. Priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures.

Natural England has demonstrated that development within 5 km from the SPA could potentially have a harmful effect on the SPA, and are therefore required to provide SANGs to mitigate the harm. HCPS however takes the view that a development of the size and magnitude as proposed at Martyrs Lane when assessed with other proposed housing developments in the locality, could not possibly receive protection from harm by mitigation measures alone. It is obvious that a large housing development just outside the 400 metre exclusion zone from the SPA will attract visitors to the SPA, regardless of there being a SANG included within the development scheme. A survey commissioned by Natural England demonstrates that the proximity of development to the SPA has adverse effects on its integrity.

HCPS owes part of the land east of Martyrs Lane and will not make it available for safeguarding by the Council. Given the land in its ownership is common land, disposing it or developing it will require an application for de-registration under s.16 of the Common Act 2006, where only the landowner can submit the application to deregister.

**Officer Response:**

The Council accepts and has always acknowledged that the SPA should be accorded the uppermost environmental protection under the European Union Directive. The importance of the SPA is within the hierarchy of environmental designations is acknowledged in Policy CS7: Biodiversity and nature conservation of the Core Strategy. Policy CS8: Thames Basin Heaths Special Protection Areas of the Core Strategy is a specifically crafted policy to avoid harm to the SPA as a result of development. The policy mirrors and is in general conformity with the requirements of Policy NRM6 of the South East Plan. The policy takes a precautionary approach to the protection and conservation of the SPA and development will only be permitted where the Council is satisfied that this will not give rise to a significant adverse effects upon the integrity of the SPA.

The Thames Basin Heath Joint Strategic Partnership Board (JSPB) coordinates a strategic approach to the protection of the SPA and working with Natural England has agreed the most appropriate avoidance/mitigation measures to avoid harm to the SPA as a result of development impacts. In particular, it requires that no sites should be allocated or granted planning permission for net new residential development within 400 metres exclusion zone from the SPA. New residential development beyond 400 metres but within 5 kilometres of the SPA boundary will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the requirements will apply are set out in the Council's SPA Avoidance Strategy. The land east of Martyrs Lane is outside the 400 metres exclusion zone but within the 5 kilometres from the SPA boundary. Its potential safeguarding or allocation for development will therefore comply with Policy NRM6 of the South East Plan and Policy CS8 of the Core Strategy provided adequate contributions are made towards the provision of SANG and SAMM. In this regard, there could be no in principle policy objection to the safeguarding of the site. Officers are confident that the above requirements will be met if the Council decides to safeguard the land for future development.

It is acknowledged that the proximity of development to the SPA is an issue that needs to be taken into account in seeking to avoid harm to the SPA. The Council is aware of surveys carried out about the locational relationship between development and the SPA. However, that is not and should not be an absolute constraint to development. In fact there are a number of examples of major applications/proposals at a similar distance from the SPA such as Queen Elizabeth Barracks and Deepcut Barracks where appropriate mitigation has been agreed to avoid significant adverse impacts on the SPA. The Council will always learn lessons from similar existing sites and work in partnership with Natural England to agree appropriate measures of mitigation for any potential proposal.

Natural England submitted a representation in response to the consultation. It does not have any objection in principle to the safeguarding of the site. It notes the proximity of the site to the SPA and has recommended for an early engagement with the Council to agree the approach to mitigation. It has suggested that whilst the SPA Delivery Framework states that SANG should be provided on the basis of 8 hectares per 1,000 population, due to the proposed size of the site and its proximity to the SPA, the avoidance and mitigation will need to be over and above this minimum quantum. The Council will initiate the engagement at the appropriate time and is confident that appropriate measures of mitigation would be agreed if the land is to be safeguarded and/or developed.

The Council has prepared a land ownership map of the land east of Martyrs Lane and is aware of the part of the land in the ownership of HCPS. It is not intended that this part of the site will be developed. It is included to ensure the defensible boundary of the Green Belt. To put it into context, the land in the ownership of HCPS is about 1.42 hectares (approximately 1.3% of the entire land). Most of the land is either Common Land, in Flood Zones 2 and 3 or within the SPA. The consultation document makes it clear that these areas will not form part of the developable area. The unwillingness of HCPS to make the land available would therefore not compromise the delivery of the site to meet the Council's overall objectives. Consequently, it

would not be necessary to make an application for the deregulation of the land as Common Land under s.16 of the Common Act 2006.

**Contributor Reference:** 00476/1/001  
**Customer Name:** Mr Victor Blanchard

**Summary of representation:**

The roads (mainly access to the M25, and the M25 itself) and the infrastructure (hospitals, GP surgeries, schools) are already far too busy and under pressure already to allow such a major housing development in this area. The A320 – the busiest road in Surrey – which is a major access route to the M25 – would not have capacity for such a scale of housing. The infrastructure would need major improvements. Not confident that infrastructure work is satisfactory judging by the state of the roads in the whole area, the waiting time in St Peters Hospital or the ability to get an appointment at local GP on the day.

The current water work done on the A320 for more than a year is concerning and the road is now patchy and has been re-done in a very poor quality. It could have been a good opportunity to widen that axis and improve it. Another proof that the council and the country in general does not consider infrastructure as a high priority.

Infrastructure provision is a major problem in the UK in general, especially when compared to European neighbours.

**Officer Response:**

The potential traffic impacts of the proposal are described in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. The A320 has been identified as a potential traffic hotspot which would be exacerbated by new development on land to the east of Martyrs Lane. The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

The Topic Paper also addresses the issue of infrastructure provision, and sets out how development at this site would be supported by necessary social, physical and green infrastructure in order to be sustainable.

**Contributor Reference:** 00503/1/001  
**Customer Name:** Mr John Bigham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00495/1/001

**Customer Name:** Mr Ian Brown

**Summary of representation:**

Having reviewed and noted both the positive (e.g. a single site big enough to meet the housing requirement) and negative (e.g. still involves loss of green belt) findings in the WBC Sustainability Appraisal applicable to the East of Martyrs Lane site, on balance sees the opportunity, albeit in the longer term, for development of a new neighbourhood centre, as the factor that leads to support of the potential substitution. Understands that the number of houses has to grow to a sufficient number to make such a neighbourhood centre viable but suggests the council should ensure that this part of any plan from the outset.

**Officer Response:**

The merits of the proposal as expressed in the representation are noted and will weigh up in the balance of considerations by Members.

It should be noted that there are also opportunities for improved or new infrastructure provision in the originally proposed six allocated sites. A new Neighbourhood Centre may not be viable, but it might be possible to provide new/improved local infrastructure improvements, such as green spaces and play areas.

If the land to the east of Martyrs Lane were allocated for development, the Council would consider making it a key requirement that a new Neighbourhood Centre (or new local facilities and services) were provided as part of any development coming forward.

**Contributor Reference:** 00465/1/001  
**Customer Name:** Ms Chris Eastwood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00466/1/001

**Customer Name:** Ms Kay Killen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00467/1/001  
**Customer Name:** Ms Janet Pepper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00468/1/001  
**Customer Name:** Mr Gavin Killen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00158/1/001  
**Customer Name:** Mr Jonathan Cottam

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00469/1/001  
**Customer Name:** Ms Alice Killen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00470/1/001

**Customer Name:** Dario Daloia

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00471 /1 /001

**Customer Name:** Mr Will Killen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00472/1/001  
**Customer Name:** Mr Stephen Kelly

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00473/1/001  
**Customer Name:** Mr Mark Snow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00474/1/001  
**Customer Name:** Mr Donald Carter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00475/1/001  
**Customer Name:** Ms Frances Carter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00477/1/001  
**Customer Name:** Ms Carolyn Hayter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00478/1/001  
**Customer Name:** Ms Jane Morris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00479/1/001  
**Customer Name:** Ms Caroline Murdoch

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00480/1/001  
**Customer Name:** Mrs Karen Sandford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00481 /1 /001

**Customer Name:** Mr Terence Sandford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00482/1/001

**Customer Name:** Suki Sritharan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00483/1/001  
**Customer Name:** Mr Perry Burton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00484/1/001  
**Customer Name:** Mr Andrew Gibbs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00485/1/001  
**Customer Name:** Ms Karen Maynard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00486/1/001

**Customer Name:** Mr Joe Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00487/1/001  
**Customer Name:** Ms Janet Bolton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00488/1/001  
**Customer Name:** Mr Scott Harrison

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00489/1/001  
**Customer Name:** Ms Marion Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00490/1/001  
**Customer Name:** Ms Carolyn Tapp

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00492/1/001  
**Customer Name:** Ms Sharlene Joannides

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00493/1/001

**Customer Name:** Mr Gari Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00494/1/001  
**Customer Name:** Ms Alison Holmes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00496/1/001  
**Customer Name:** Ms Vicki Leggett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00497/1/001  
**Customer Name:** Mr Walter Hulatt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00498/1/001  
**Customer Name:** Mrs Gillian Hulatt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00499/1/001  
**Customer Name:** Fenella Hames

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00500/1/001  
**Customer Name:** Mr Richard Mensa–Annan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00501/1/001  
**Customer Name:** Ms Cecilia Wills

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00502/1/001  
**Customer Name:** Mr Patrick Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00491 /2/001  
**Customer Name:** Ms Marilyn Higham

**Summary of representation:**

Objects primarily due to the added congestion and pollution in and around the A320 and A245 but also due to the lack of biodiversity and loss of habitat for the wildlife in this area.

Birds and insects would no longer have places to feed, nest or shelter. This would not only be affecting the actual area to be developed by way of loss of mixed woodland, mature tree belts, hedgerows and even ancient woodland, but would also have a negative impact on the nearby Horsell Common. Horsell Common is an SPA and is already used to the limits of its capabilities. The main carpark is always full, there is a problem with dog fouling and rubbish littering due to the high number of dog walkers and other sections of the community who use it, so it would not be able to cope with any extra pressures.

Both the A320 and the A245 roads are already at saturation point as evidenced by the current road works along the A320 which has produced huge tailbacks as well as drivers taken avoiding action so that the surrounding roads are jammed too. Any extra traffic generated by this development would be catastrophic for current road users, for the environment and for the air quality breathed by the population in general as well as for the economy with the time lost in traffic jams. Air quality in this area is already a problem with the two main roads – which are adjacent to the proposed site – being extremely congested on a regular basis. This would worsen if the development were to go ahead, especially as the increased car use would be inevitable and extremely high as there are no local schools, shops, health centres or any other essential amenities within a reasonable walking distance. The bus services are totally inadequate along these roads, so they would be no help to anyone.

The proposed site is part of the Green Belt and has a semi-rural aspect and this development would merely add to the creeping urbanisation in the area. There would be a fragmentation, if not complete destruction, of habitat for the wildlife. In addition, the surrounding population would have a loss of enjoyment of the current woodland and pleasant rural aspect which is known to affect one's sense of well-being.

The increase in population would lead to an increase in the amount of rubbish produced and the inevitable littering as well as increased dog fouling and more importantly the cat population would increase exponentially, which is a huge problem for any birds which may possibly remain, due to cat predation.

There is also the question of the flooding risk and also the inevitable surface water run-off. Trees are crucial to minimise the risk of flooding, so the problem would be exacerbated by the loss of so many trees and the construction of so many houses. Water demand is already high and stretches the supplies at various times in the summer in this area.

All of the above would apply once the development has been completed but there would also be extra disturbance, noise and air pollution, traffic congestion and a subsequent impairment to the quality of life whilst the construction was underway.

**Officer Response:**

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses many of the issues raised in each representation in detail, including: the impact of the proposed development on traffic in around the A320 and A245; public transport infrastructure; environmental impacts, such as on biodiversity and designated nature sites (e.g. Horsell Common); assessment of Green Belt quality and outcome of studies on Green Belt impacts; and impacts of development on flooding, including surface water run-off.

It should be noted that environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have been consulted and their representations, and the Council's response, can be accessed for more information.

At the time of writing, air quality in Woking Borough is generally good, and assessments are frequently carried out by the Council. The area around land to the east of Martyrs Lane and surrounding roads have not been identified as having low air quality. The Council has also adopted a Development Management Policies DPD which contains a policy on air and water quality (DM6), which requires large developments to submit an Air Quality Assessment identifying the change in air quality that will result from the proposed development, and an appropriate scheme of mitigation if necessary, in order to be supported for planning permission.

It should also be noted that although the Sustainability Appraisal assessed the identified land as being beyond walking distance to local facilities, resulting in an increased need to travel by car, there is scope for a development of this scale to provide on-site infrastructure to support any development coming forward. Access by bus or bicycle to the Town Centre was also assessed to be good, and any development coming forward at the site could contribute towards the improvement of this infrastructure.

**Contributor Reference:** 00427/1/001

**Customer Name:** Mr Ian Arden

**Summary of representation:**

This 112 hectare site provides an opportunity to meet the need for 1200 units, including affordable housing and traveller site within a discrete locality. Such a site will enable for the more efficient provision of both social, service, and transport infrastructure.

The site is in close proximity to the A320 north of Woking, thus providing easy access to the M25 and access to the rail and bus services to the south with minimal impact on Woking towns centre.

The site is in close proximity to major employers of the area including St Peter's Hospital, the Animal and Plant Health Agency, McLaren Technology Centre and the Brooklands Retail Park. The development of such a large site provides the opportunity to develop a truly integrated community with the provision of Affordable Housing (CS12), Specialist Residential Accommodation (CS13) and Provision of Travellers (CS14) all on one site. This would enable the local authority to meet its targets for development, whilst removing a number of isolated development sites that are not integrated into the community such as Ten Acre Farm, Mayford. The size of this site means that the local authority has the capability to further develop the site to meet local needs in the 2027–2040 Development Plan

The majority of the site is outside of flood risk areas with the majority of natural fluvial flow being away from main areas of development.

Elements of the proposed site have already been granted planning permission for alternative uses, so the site can be considered as suitable for development . The development requirements for this sites can be integrated into the Sheerwater redevelopment plan, which lies to the east/south east of the site.

**Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The potential for the site to provide accommodation for older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government Policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is single or multiple sites.

At the Regulation 18 stage Officers had recommended to Council the needs for travellers accommodation should be met at 5 Acres and 10 Acres. The need as determined is 19 pitches up to 2027. At the Council meeting members have requested that Officers re-visit that recommendation and report to them before they make a decision about their strategy for the Regulation 19 Consultation. Officers accordingly are investigating this matter and will report to Council in due course.

In terms of flooding, given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

In terms of roads and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00458/1/001  
**Customer Name:** Ms Katie Pollard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00445/1/001  
**Customer Name:** Ms Alexandra Harris

**Summary of representation:**

It is not considered there is adequate transport infrastructure for this development. The roads are congested and there are several developments on our door step and in close proximity such as Martyrs Lane, Fair Oaks, Brox Lane, Aviator Park and Longcross. The A319, A320, M25, A3 and M3 are busy roads and the area is gridlocked due to accidents on these motorways.

The area of Woking and Runneymede is highly populated with inadequate facilities such as hospitals, schools, elderly care facilities etc. The size of development proposed is far too large for the existing surroundings to cope with.

Surrey is often portrayed as being a very green county with lots of countryside for residents to enjoy. The Green Belt was designed for a reason – to keep areas green and protect wildlife and residents from towns spreading and merging into each other. Removing areas from the Green Belt removes the identity of Surrey and will destroy the environment.

**Officer Response:**

In terms of infrastructure, hospitals, schools, elderly care facilities etc, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments such as Brox Lane, Aviator Park and in particular Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to quantify the transport and education provision needed to support the development and how they could be delivered. All other relevant infrastructure and utility providers are also consulted to help assess the infrastructure needs to support future growth. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

In terms of transport and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast

highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of protection of the Green Belt. The Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the

Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

The conclusions of the two studies are sufficiently clear to demonstrate that the development of the land east of Martyrs Lane would lead to urban sprawl and an incursion into the Green Belt. It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development.

Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 00455/1/001  
**Customer Name:** Ms Clare Brown

**Summary of representation:**

Green Belt land should be protected and Byfleet Village has a particular need because so little Green Belt land is now available in the village. This is also worse because of the developments planned for Broadoaks and West Hall which will make the Parvis Road unusable.

We have enough housing as it is in the village. The traffic is already extremely heavy through the village.

**Officer Response:**

The justification for the release of Green Belt land for the development has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper. The matters regarding infrastructure, traffic and Green Belt in Byfleet are also addressed in the topic paper, with particular reference to section 1.0, 3.0, K, L and U.

**Contributor Reference:** 00456/1/001  
**Customer Name:** Mr Andrew Cornwell

**Summary of representation:**

Concerns with the proposals to develop on green belt land in the Byfleet area. There has been large developments of housing in the area over the last 10 years, the amenities have not developed to accommodate the increase in population at the same rate. There is a lack of infrastructure such as traffic congestion, insufficient school places, medical and dental facilities as well as insufficient public transport links to match the increase in population.

The area has seen a decline in green spaces and further building would see that reduce further. The remaining green belt land is predominantly on flood plains which would be unsuitable for development especially considering the area flooded a couple of years ago. Please reconsider the decision to develop our precious green belt land and protect it for future generations.

**Officer Response:**

The justification for the release of Green Belt land for the development has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper. The matters regarding infrastructure, flooding, traffic and Green Belt in Byfleet are also addressed in the topic paper, with particular reference to section 1.0, 3.0, 5.0, K, L and U.

**Contributor Reference:** 00464/1/001  
**Customer Name:** Ms Sarah Johns

**Summary of representation:**

Objects to building on the Green Belt.

There is a lack of infrastructure especially the traffic congestions on the roads which are in need of updating. There will not be sufficient school palaces and doctors surgery appointments.

In 2013 over 2,000 Byfleet residents signed a petition to protect the Green Belt in Byfleet.

Byfleet Village is already over developed without suitable community facilities.

Large areas in Byfleet are on the Flood Plain and more development will cause further flooding

Traffic on Parvis Road at a standstill

The developments at Broadoaks and West Hall, which will worsen the congestion.

The Broadoaks site and part of the Martyrs Lane site are on Green Belt land which has already been developed which is not true of the other proposed sites. These previously developed sites and the West Hall site are more than enough to meet the need of housing.

**Officer Response:**

The justification for the release of Green Belt land for development and future development needs has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper. The matters regarding flooding, infrastructure and traffic have also been addressed in the 'Regulation 18 Consultation issues and matters topic paper' refer to section 3.0, 5.0, K, L and U for the Council response.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL

contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of school provision, it is not known at this stage which type and nature of provision will be allocated on site. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Infrastructure Delivery Plan notes that at present there is adequate GP provision to meet overall demand in the Borough. Whilst this is the case, it is also accepted that there might be locally specific pressures of over subscription that needs to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is seeking to work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 00459/1/001

**Customer Name:** Ms Sarah May

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00460/1/001  
**Customer Name:** Ms Julie Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00461 /1 /001  
**Customer Name:** Ms Fiona Lochhead

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00462/1/001  
**Customer Name:** Ms Sara Hyland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00463/1/001

**Customer Name:** Anjali Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00426/1/001  
**Customer Name:** Ms Kerry Lacey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00429/1/001

**Customer Name:** Ms Johanna Wiltshire

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00430/1/001

**Customer Name:** Mr John Scott

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00431 /1/001  
**Customer Name:** Mr And Mrs Brian Hayter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00432/1/001  
**Customer Name:** Ms Crystal Davis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00433/1/001

**Customer Name:** J T Lyddon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00435/1/001  
**Customer Name:** Mr James Salford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00436/1/001

**Customer Name:** J P Harrop

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00437/1/001  
**Customer Name:** Ms Tracy Addis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00438/1/001  
**Customer Name:** Ms Jasmine Wiltshire

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00439/1/001  
**Customer Name:** Ms Gaynor Page

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00440/1/001  
**Customer Name:** Ms Kathryn Wood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00441 /1 /001  
**Customer Name:** Mr D P North–Coombes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00442/1/001  
**Customer Name:** Mr Giuseppe Sole

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00443/1/001  
**Customer Name:** Ms Jenny Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00444/1/001  
**Customer Name:** Ms Elizabeth Parry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00446/1/001  
**Customer Name:** Mr Steve Messenger

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00447/1/001

**Customer Name:** Mr Colin Carr

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00448/1/001  
**Customer Name:** Ms Dorothy Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00449/1/001  
**Customer Name:** Mr Craig Tilbury

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00450/1/001  
**Customer Name:** Ms Julia Tilbury

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00451 /1 /001  
**Customer Name:** Ms Jennifer Stott

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00452/1/001  
**Customer Name:** Ms Jan Hunter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00453/1/001  
**Customer Name:** Ms Sue Scheide

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00454/1/001  
**Customer Name:** Mr Frank Palombo

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00457/1/001  
**Customer Name:** Mr Russell Hughes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00428/1/001  
**Customer Name:** Mrs Lindsey Arden

**Summary of representation:**

This 112 hectare site provides an opportunity to meet the need for 1200 units, including affordable housing and traveller site within a discrete locality. Such a site will enable for the more efficient provision of both social, service, and transport infrastructure.

The site is in close proximity to the A320 north of Woking, thus providing easy access to the M25 and access to the rail and bus services to the south with minimal impact on Woking towns centre.

The site is in close proximity to major employers of the area including St Peter's Hospital, the Animal and Plant Health Agency, McLaren Technology Centre and the Brooklands Retail Park. The development of such a large site provides the opportunity to develop a truly integrated community with the provision of Affordable Housing (CS12), Specialist Residential Accommodation (CS13) and Provision of Travellers (CS14) all on one site. This would enable the local authority to meet its targets for development, whilst removing a number of isolated development sites that are not integrated into the community such as Ten Acre Farm, Mayford. The size of this site means that the local authority has the capability to further develop the site to meet local needs in the 2027–2040 Development Plan.

The majority of the site is outside of flood risk areas with the majority of natural fluvial flow being away from main areas of development.

Elements of the proposed site have already been granted planning permission for alternative uses, so the site can be considered as suitable for development. The development requirements for this sites can be integrated into the Sheerwater redevelopment plan, which lies to the east/south east of the site.

**Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable

Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

It is accepted that the land east of Martyrs Lane is in close proximity to these major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD.

The potential for the site to provide accommodation for Policy CS13: older people and vulnerable groups as set out in the representation is noted, but it should be noted that the other sites are also of a sufficient scale to support this type of accommodation if needed. At this stage of the plan making process, the Council is seeking to safeguard land for future development needs between 2027 and 2040. The exact type and nature of development will be considered as part of a review of the Core Strategy and or Site Allocations DPD.

The merits of the Martyrs Lane site for Gypsy and Traveller accommodation as set out in the representation is noted. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet its identified Traveller accommodation need. In doing so, the Council also has to make sure that sufficient sites have been identified to ensure enduring permanence of the Green Belt boundary. The requirements of CS14 as well as the Government Policy on Travellers set out in Planning Policy for Travellers will be applied irrespective of whether it is single or multiple sites.

At the Regulation 18 stage Officers had recommended to Council the needs for travellers accommodation should be met at 5 Acres and 10 Acres. The need as determined is 19 pitches up to 2027. At the Council meeting members have requested that Officers re-visit that recommendation and report to them before they make a decision about their strategy for the

Regulation 19 Consultation. Officers accordingly are investigating this matter and will report to Council in due course.

In terms of flooding, given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this.

In terms of previously developed land, parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The

Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

In terms of roads and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00424/1/001  
**Customer Name:** Ms Natasha Nilsson

**Summary of representation:**

The existing road infrastructure is already at capacity resulting in congestion and traffic. The roads are not wide enough and widening of the A320 will be required.

Saddened by the thought of tree removal and natural beauty for housing. It will impact the quality of life for residents and is not a sustainable long term solution.

The development of 1200 homes will result in more housing needed in the long term due to growing population needs.

How will St Peters Hospital cope with additional demand. It is already at capacity.

Object to the urbanisation of the land to the east of Martyrs Lane.

**Officer Response:**

The representation regarding the existing road network as well as woodlands and wildlife has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

The Council is fully committed to the comprehensive delivery of the Core Strategy which seeks to facilitate the delivery of 4964 dwellings over the plan period. It is also committed to safeguarding land for future development needs between 2027 and 2040 as required by national planning policy. At this stage it would be unreasonable to predict the housing needs of the borough and wider housing market area beyond this, as set out in the representation. Nevertheless the overriding consideration of the Site Allocations DPD is to ensure that the Council identifies the most sustainable sites when compared against all reasonable alternatives. The allocation of any of the safeguarded sites for development as well as future housing requirements will be considered as part of any review of the Site Allocations DPD and or Core Strategy.

As set out in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper, the Council will work with the relevant providers to make sure that infrastructure supports planned development. It should also be noted that the Council is working with the relevant healthcare providers, including the Clinical Commissioning Groups, to identify healthcare provision and distribution to meet future needs.

Objection to the proposal is noted.

**Contributor Reference:** 00418/1/001  
**Customer Name:** Ms Nicola Elliott

**Summary of representation:**

Concerned that 3500 new houses would result in 5000 additional cars in the area. There is no additional road network provision planned and existing traffic congestion is already high.

There is no additional infrastructure to support the proposal and therefore would place a lot of pressure on the existing facilities.

There would be an increased risk of flooding and part of this land is susceptible to subsidence.

The site is connected to a SSSI and is home to a wide range of wildlife which would be destroyed.

Development would also increase pollution generally.

Asks that this site is not allocated for development.

**Officer Response:**

The Martyrs Lane consultation is in respect of the possibility of substituting the Martyrs Lane site for the six safeguarded sites identified previously in the draft Regulation 18 version of the Site Allocations DPD, to meet the long term development needs of the Borough between 2027 and 2040. It is anticipated that the site is sufficient to enable the delivery of at least 1200 net additional homes and the necessary green and other infrastructure to support the potential development of the site. The consultation therefore is not to safeguard the site for 3500 new homes as suggested in the representation.

Based on the above, it is unlikely that safeguarding of this site would result in 5000 additional cars in the area. The Council is fully aware of local resident's concerns regarding the existing traffic congestion in the area. In order to quantify and forecast vehicular trips the Council has carried out a number of studies including a Strategic Transport Assessment. Please refer to the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper for the Council's response to traffic congestion and highways impacts.

The representations regarding infrastructure provision, flooding, the British Geological Survey and wildlife have been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Regarding pollution generated from any proposed development, there are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of

communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

Whilst objection to this proposal is noted, the Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives.

**Contributor Reference:** 00425/1/001  
**Customer Name:** Mr Benedict Watt

**Summary of representation:**

Development in one area would destroy one of Britain's greatest golf courses and cause huge traffic issues for the A320, A245, M25, M3 and A3. These roads already have serious issues and development would have an adverse impact on these roads and in turn the local economy.

**Officer Response:**

The New Zealand Golf Course has confirmed that the land within its ownership is unavailable for residential development. Nevertheless the Council has Compulsory Purchase Powers which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation. If the golf course is safeguarded for future development needs then it is correct that there will be a loss of this sporting facility. The Council has consulted Sports England and their response will be addressed separately and taken into account.

The representation regarding roads and traffic has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper. As set out in the response, the Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. Through identifying and implementing these mitigation measures, it is not considered that development will have an adverse impact on the local economy.

**Contributor Reference:** 00414/1/001  
**Customer Name:** Mr David James

**Summary of representation:**

Support the substitution. Even if only considered suitable in part.

**Officer Response:**

Support noted

**Contributor Reference:** 00421/1/001  
**Customer Name:** Ms Linda Brown

**Summary of representation:**

The sites at Byfleet regularly flood.

Infrastructure in the area is inadequate for additional development, including schools, GPs, dentists, public transport, congested roads (including Parvis Road). The character of Byfleet as a village will be lost.

Questions why there has not been any proposed sites at the Horsell side of Woking to date?

**Officer Response:**

The justification for the release of Green Belt land for development and future development needs has been fully addressed in the 'Regulation 18 Consultation issues and matters topic Paper'. The matters regarding infrastructure, flood plains, medical facilities and traffic congestion have also been addressed in the 'Regulation 18 Consultation issues and matters topic paper', please refer to section 1.0, 3.0, 5.0, M and U for the Council's response.

As part of the preparation of the Draft Site Allocations, 125 alternative sites were assessed. This is set out in the Sustainability Appraisal which can be found on the Council website. Based on this and other evidence including the Green Belt Review, the most sustainable sites were put forward for the Draft Site Allocations DPD compared to other reasonable alternatives.

There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 00423/1/001

**Customer Name:** Mr John Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00416/1/001  
**Customer Name:** Mr Paul O'Neill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00417/1/001  
**Customer Name:** Mr Rory O'Neill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00419/1/001  
**Customer Name:** Ms Alison Grant-Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00420/1/001  
**Customer Name:** Mr Patrick Munday

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00422/1/001

**Customer Name:** Ms Mary Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00415/1/001  
**Customer Name:** Mr Geoff Warrington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00401/2/001  
**Customer Name:** Mr Richard Grinter

**Summary of representation:**

The representation is appalled by the proposal that will destroy the local area. The Council is already ruining the area by adding large numbers of families to Sheerwater and now you want to compound that further by building on the proposed McLaren Newtown area.

Schools are oversubscribed, there are traffic jams everywhere, it would be a disaster for the local area if you moved forward with this proposal.

**Officer Response:**

The proposed Sheerwater Estate regeneration scheme has been granted planning permission for the comprehensive redevelopment of the site. Any adverse impacts generated as a result of the proposal will have been dealt with at the time the application was being determined. As set out in Core Strategy Policy CS5, Sheerwater and Maybury have been identified as a Priority Place due to the pockets of deprivation within them. The proposed regeneration scheme is anticipated to address a number of these issues to create a sustainable community and bring about a positive change in these areas.

The representation regarding traffic has been addressed in the Council's Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to determine measures of mitigation needed to support the development, and how they could be delivered in order for development to be considered acceptable.

**Contributor Reference:** 00413/1/001  
**Customer Name:** Mr Alex Downham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02682/1/001

**Customer Name:** P D Robbins

### **Summary of representation:**

Objects to the proposal as follows:

– Green Belt: the Green Belt boundary review concluded that the land had very low/low suitability for release from the Green Belt, and recommended the originally proposed sites. It would be a significant incursion on the Green Belt. This was professional, independent advice. The sudden inclusion of land to the east of Martyrs Lane has been fostered by Councillors from Wards threatened with development – the professional approach has been high jacked; we now have a political auction. The current boundary of the Green Belt to the north of Woking's conurbation is one that can be well defended. Any development to the north of the A245 could open the floodgates to extending the urban area. It would also reduce distance to Ottershaw, risking merging between towns.

– Environment: the land is part of an important green corridor which enhances species diversity and movement running down River Bourne easterly towards London. Development here would prejudice this corridor. It is adjacent to Horsell Common SPA and SSSI. This SPA is already one of the heaviest used parts of the Thames Basin Heaths. Additional walkers and dogs would use the Common, which would threaten protected Nightjars and Dartford Warblers. A SANG will not stop new residents freely crossing the A320 with their dogs to use the Common, although it might deter domestic cats. The Woking Habitats Regulation Assessment is speculative on air quality in that it suggests NOx pollution on the Heath will reduce over the next ten years.

Although largely unaffected by flooding, the flood zone will need amending when the effect of run-off from the development is considered. There is no research available about the quality of the land for farming or for large-scale building operations. Nor has there been a proper wildlife survey. Although these would be required for a future planning application, these surveys should be conducted before such a major planning policy is approved.

– Sustainability: the site performs badly regarding access to Woking and railway stations by sustainable modes; congestion would therefore increase on the A320 or A245 which are already busy. Too distant for walking. The proposed estate would be distinctly separate from Woodham due to a very busy road. Would not be suitable for affordable housing because of its position. Unsustainable position for local sports facilities. Inconvenient to access secondary schools, medical facilities, retail shops and other services. Development might result in loss of Civic Amenity Site which is an important service for this side of the town, which would be costly to move. Ancient woodland would be lost. Very speculative to suggest residents on the site might work for major local employers.

– Deliverability: there is a reasonable prospect the originally proposed sites can be delivered. This isn't the case at Martyrs Lane due to the golf club nor McLaren making their land available. The site contains an area of Registered Common Lane adjacent to the McLarens roundabout so there is little prospect of the site having access onto that roundabout. Any alternative access will involve costly and tricky highway changes – unlikely to be borne by developers.

- Fair Oaks: the potential cumulative impact of this Garden Village proposal on the Common and SPA must be assessed before this allocation can be considered.
- Policy NRM6: this retained South East Regional Plan policy specifically states that priority should be given to directing development to those areas where adverse effects on the SPA can be avoided. The originally proposed sites should therefore be preferred.

### **Officer Response:**

Objection is noted and the points raised in the representation will weigh in the balance of considerations by Members.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses many of the concerns raised in detail, including:

- conclusions from the Green Belt boundary review and Landscape assessment into contribution of the land towards Green Belt purposes such as urban sprawl and towns merging;
- the perceived bias and political motivation of the proposal;
- the environmental concerns about the site regarding wildlife and loss of ancient woodland, and how it is recognised that a detailed ecological assessment is required;
- how development of the site would not compromise the Thames Basin Heaths SPA and how it would comply with policy NRM6;
- the risk of flooding and exacerbation of flood risk elsewhere;
- the sustainability of developing the site, including availability of public transport infrastructure and provision of other infrastructure services such as schools and health facilities;
- the traffic implications of the proposal on the A320 and A245;
- the impact on the recycling centre;
- the availability of the land for development, and deliverability.

In addition, the Council has received a representation from Natural England and Horsell Common Preservation Society regarding the Thames Basin Heaths SPA and has responded accordingly. The responses are available to view for further information. In summary, the Council does not accept that the development of the site would compromise the overall integrity of the nearby Thames Basin Heaths SPA and its ecological integrity and the ecology of the wider area. The site can be developed to comply with the requirements of Policies NRM6 of the South East Plan and CS8: Thames Basin Heaths Special Protection Areas of the Core Strategy. Natural England does not have any objection in principle to the proposal, subject to the appropriate measures of mitigation being agreed. This matter has been addressed in detail in the Officer's response to the other representations made by Horsell Common Preservation Society. There is no proven functional linkage between the SPA and the site, which is of such significance to prevent the development of the site.

Regarding the representation on air quality: there is no declared air quality management area in the vicinity of the Martyrs Lane site. The Council has robust policies to manage air quality impacts as a result of development, such as Policy DM6: Air and Water Quality, of the

Development Management Policies DPD. This, and other policies, would apply to manage other sources of pollution as a result of development. Officers are satisfied that if the site is to be safeguarded it can be delivered without unacceptable risk to air quality.

The quality of the land within the site has been assessed as part of the Green Belt boundary review and the Landscape assessment by Hankinson Duckett. As referred to in the Topic Paper, the studies conclude that the land is inappropriate for release from the Green Belt. The land has also been assessed by DEFRA regarding its agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

It is incorrect to assume that the site would not deliver affordable housing. The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance, which includes the Fair Oaks Garden Village proposal. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. Should the land be safeguarded for development, the Council will continue to work with neighbouring boroughs and statutory consultees such as Natural England to determine the mitigation measures required to address any cumulative impacts on Horsell Common and the Thames Basin Heaths SPA. This work would take place during the Site Allocations DPD preparation process, as well as during the Development Management stages, under the Duty to Cooperate obligations. Land will only be released for development upon a future review of the Core Strategy and/or the Site Allocations DPD, at which point it is likely that the key requirements of a safeguarded site would set out various criteria that development proposals must meet in order to be supported, including mitigation measures to preserve the integrity of the SPA.

If developed, it is anticipated that the site would accommodate at least 1,200 dwellings which would make a significant contribution towards meeting the Borough's future housing needs.

**Contributor Reference:** 00404/2/001  
**Customer Name:** Ms Colette Grace

**Summary of representation:**

Development here would not be sustainable, there are already problems with infrastructure including roads, congestion, flooding.

The rural character of the area would be ruined, with the loss of woodlands.

The quality of life for new residents would be poor living close to the tip.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

The social and environmental implications of the recycling centre will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

In addition, development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 00405/2/001  
**Customer Name:** Mr Chris Grace

**Summary of representation:**

The existing road network is gridlocked particularly when roadworks are taking place.

The existing local infrastructure can not cope including healthcare facilities where it is difficult to get an appointment in an acceptable time frame.

**Officer Response:**

The representation regarding the existing traffic conditions within the local area has been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper. As noted within the transport assessments that have informed the Site Allocations DPD, the studies consider normal traffic movements and patterns on the local road network. These studies do not take into account temporary diversions as a result of roadworks and road closures as they do not represent normal or usual traffic conditions or movements. Further information setting out the methodology for the studies is set out in the relevant evidence base documents.

The Council's Infrastructure Delivery Plan notes that at present there is adequate GP provision to meet overall demand in the Borough. Whilst this is the case, it is also accepted that there might be locally specific pressures of over subscription that needs to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is seeking to work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

Additional information regarding infrastructure provision to support development has been set out in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 00397/1/001  
**Customer Name:** Mr Robin Rees-Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00398/1/001  
**Customer Name:** Ms Lyndsay Rees-Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00399/1/001  
**Customer Name:** Ms Sarah Swift

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00400/1/001  
**Customer Name:** Mr Craig Swift

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00402/1/001

**Customer Name:** Ms Gemma Summerscales–Heard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00403/1/001  
**Customer Name:** Mr Ben Hamilton–Power

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00404/1/001  
**Customer Name:** Ms Colette Grace

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00405/1/001  
**Customer Name:** Mr Chris Grace

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00406/1/001

**Customer Name:** Mr Carl Pring

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00407/1/001

**Customer Name:** Mr Nigel Hart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00408/1/001  
**Customer Name:** Ms Sara Mangold

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00409/1/001  
**Customer Name:** Ms Melanie Jacques

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00410/1/001

**Customer Name:** Mr Nigel Firth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00411 /1 /001  
**Customer Name:** Ms Vicky Downham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00412/1/001

**Customer Name:** Mr James Downham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02683/1/001

**Customer Name:** Mr And Mrs Bernard And Wendy Hennessy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

It will ruin the fabric of our society and devalue our homes and quality of life.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

The Regulation 18 Consultation Issues and Matters Topic Paper sets out in detail how the allocation of sites to meet the housing need for the Borough will not undermine the overall social fabric of the area.

Whilst the value of land and property is not a material planning consideration, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 02684/1/001

**Customer Name:** J R Vachs

**Summary of representation:**

Objects to proposal due to huge impact on an area which has already seen changes.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

If the Council were to decide to safeguard this site or any of the other six sites, its development will take into account any development proposals in the vicinity of the site.

**Contributor Reference:** 00396/1/001  
**Customer Name:** Mr Paul Tombs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02968/1/001

**Customer Name:** Mr And Mrs Margaret And Maldwyn John

**Summary of representation:**

Supportive of the proposal: an opportunity to construct appropriate infrastructure with development coming forward – particularly drainage. The separate development of the six safeguarded sites will probably lead to overload of the existing services in some if not all of these sites. The scale of housing allows for provision of community facilities such as at Parkview – perhaps even a school and a surgery.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. The Council will make sure that the development of any land that is safeguarded is supported by adequate and necessary infrastructure. This will be the case whether it is a single site or multiple sites. The Council has adopted the Community Infrastructure Levy as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site – whether it at Martyrs Lane or the originally proposed sites.

**Contributor Reference:** 00387/1/001  
**Customer Name:** Mr Martyn Drake

**Summary of representation:**

Building on one site rather than six would minimise disruption to the surrounding area during construction. Martyrs Lane site could be landscaped to better suit the area rather than filling in small areas of housing across multiple sites.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

It should be noted that the allocated sites would be safeguarded to meet development needs between 2027 and 2040. It is highly unlikely that all six sites would be developed concurrently during this time: safeguarded land would be released gradually as and when required, and therefore construction impacts across each of the six originally proposed sites would be dispersed.

In terms of landscaping, all proposals for development would need to meet policy requirements set out in the Development Plan at the time that the safeguarded land is released; which is likely to include a policy on design to ensure the development incorporates landscaping that enhances the setting of the development, irrespective of whether it is one large site or multiple sites.

**Contributor Reference:** 00373/1/001  
**Customer Name:** Mr Charles Blane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00375/1/001  
**Customer Name:** Mr Phil Hardyman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00376/1/001  
**Customer Name:** Mr Robert Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00377/1/001  
**Customer Name:** Mr Antony Shephard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00378/1/001  
**Customer Name:** Mrs Margaret Mary Shephard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00379/1/001  
**Customer Name:** Ms Anne Pinfield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00380/1/001

**Customer Name:** Mr Jim Nichol

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00381/1/001  
**Customer Name:** Mr Leon Bayero

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00382/1/001

**Customer Name:** Ms Sandra Pearce

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00384/1/001  
**Customer Name:** Mr Jeremy Niland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00385/1/001

**Customer Name:** Mr Rafal Gutaj

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00386/1/001  
**Customer Name:** Mrs Carol Hardyman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00388/1/001  
**Customer Name:** Mr Paul Dinmore

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00389/1/001  
**Customer Name:** Ms Amanda Mirrington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00390/1/001  
**Customer Name:** Mr Anthony Adams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00391/1/001  
**Customer Name:** Mr Ben Warren

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00392/1/001

**Customer Name:** Mr Ian Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00393/1/001  
**Customer Name:** Mr Neil Griffiths

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00394/1/001  
**Customer Name:** Ms Felicity Pugliese

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00395/1/001  
**Customer Name:** Ms Victoria Tombs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00374/1/001  
**Customer Name:** Ms Alison Kirby

**Summary of representation:**

Supportive of the proposal as it would render sites GB12 and GB13 in Pyrford unnecessary for allocation.

The residents of Pyrford village feel very strongly that there should not be substantial growth in the size of the village due to development. As a result of the 2016 referendum, Woking Borough Council are required to give due consideration to the views of the residents of Pyrford in their planning decisions.

The proposed developments near Teggs Lane and Upshot Lane, Pyrford for the building of over 400 properties will destroy large areas of green belt surrounding the village. It is this green belt area that has stopped Pyrford from simply being swallowed up by Woking town, enabling Pyrford to maintain its character as a small, local village.

**Officer Response:**

The Council accepts that any land taken out of the Green Belt will lead to a reduction of the amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives. The Sustainability Appraisal Report provides the evidence to support this view. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about 3.46% of the total area of the Green Belt.

The Green Belt Boundary Review assessed parcels of land against the purposes of the Green Belt, one of which is preventing neighbouring towns from merging into one another, and another purpose is to check the unrestricted sprawl or large built-up areas. The Council do not consider that the potential development of identified parcels around Pyrford would significantly reduce separation between towns or lead to unacceptable urban sprawl.

There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved.

Overall, the Council is satisfied that the social, environmental and economic character of Pырford will not be significantly undermined.

**Contributor Reference:** 02685/1/001  
**Customer Name:** Ms Lynda Hirst

**Summary of representation:**

Supports the proposal.

Less disruption to residents as there is very little development in this area, making road widening relatively easy, with easier access to the site during construction.

Large enough site to accommodate required housing, if not more, and all supporting infrastructure, rather than overloading existing infrastructure.

Can create a single large housing estate, rather than several smaller, dispersed ones.

The main drainage is being updated so there will be no need for additional disruption for improvements.

Bus and cycle routes are in place.

Close to major employers, providing employment opportunities.

Good access to A320, onto M25, A3, Heathrow, Woking Town Centre and railway, without encountering traffic delays where roads cross railway lines. Congestion in the South of Woking will be even worse when Hoe Valley school opens.

Northern parts of site are largely disused and derelict, and planning permission has already been given for McLaren land – there's a presumption for development.

Less impact on wildlife which is already contained by main roads around the Martyrs Lane site.

No national or landscape designations.

Landscaping surrounding the site to keep the country-feel of the area. Unlike some of the other sites, there will be no need to level escarpments and increase flood defences in order to protect surrounding areas which are built on the floodplain.

**Officer Response:**

Support is noted.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the

Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. Cumulatively it is also true that the original six sites could deliver a similar amount of new homes. A number of the merits and development impacts at Martyrs Lane set out in the representation are broadly similar to the other sites.

It is also acknowledged that there would be opportunities to accommodate new infrastructure in a single, large site, and that improved drainage may be available. Nevertheless, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is accepted that the land east of Martyrs Lane is in close proximity to these three major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;

- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

The opinion regarding impacts to wildlife is noted. However, the proximity of the site to protected nature sites, such as Horsell Common, would need to be taken into account. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. Policy CS7 would also require development proposals to take into account the wildlife value of the previously proposed sites, and avoid harmful impacts.

Regarding the representation on landscape designations, the Peter Brett Green Belt Boundary Review recommends that the two sites in Byfleet and on Saunders Lane as well as land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the landscape character of these areas. Detailed analysis and reasons for this recommendation are set out in the report.

The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

Whilst it is accepted that the Martyrs Lane site has a good level of screening in parts, the Green Belt review and landscape assessment conclude that the development of the land would lead to urban sprawl and an incursion into the Green Belt. If the originally proposed sites were safeguarded for development, the design of that development would be required to take into account landscape designations such as the escarpment – the escarpment would not be 'levelled', as suggested in the representation.

Section 5 of the Regulation 18 consultation Issues and Matters Topic Paper sets out how the draft Site Allocations DPD is informed by an up-to-date Strategy Flood Risk Assessment. The defined areas of proposed allocated sites where development will be required to be sited are all in Flood Zone 1. Paragraph 5.4 explains how flood risk would not be exacerbated elsewhere by development.

**Contributor Reference:** 00355/1/001  
**Customer Name:** Mr Jack Young

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00358/1/001  
**Customer Name:** Ms Katey Grant

**Summary of representation:**

The land to the east of Martyrs Lane is more accessible to main transport routes and public transport. It is local to the big employers such as St Peter's hospital and McLaren as well as all the facilities of Woking. It is currently unused land and has previously been developed in certain ways, although none of the buildings are used for community purposes.

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);

- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and

jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 00359/1/001  
**Customer Name:** Mr Paul Tuckwell

**Summary of representation:**

Strongly supports the proposal for the following reasons: land to the east of Martyrs Lane has been partially developed in the past; and the access and transport consequences are less impactful than those associated with the sites to be substituted.

**Officer Response:**

Support noted.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on area such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 00361/1/001

**Customer Name:** J P Bowman

### **Summary of representation:**

Objects to the proposal to remove the New Zealand Golf Club from the green belt so that it would be available for development in the future for the following reasons –

- The removal of the Green Belt protection would increase urban sprawl;
- The detrimental effect it would have on Horsell Common, an important SSI area. This Common would be sandwiched between this proposal and the Fair Oaks Airfield development;
- Unsuitable terrain for building upon;
- It would increase the overcrowding on the local roads;
- The required new infrastructure would be very expensive.
- Not enough use is made of brown field sites.

### **Officer Response:**

The representation regarding urban sprawl has been addressed within the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies, is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include, in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation would rest on balancing all these factors.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The representation regarding traffic and infrastructure has also been addressed within the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Regulation 18 Issues and Matters Topic Paper sets out in detail how the Council has assessed the capacity of previously developed land to meet future development needs, and describes the shortfall in the capacity of the urban area to meet the requirement. Further evidence is in the Strategic Housing Land Availability Assessment (SHLAA) which is available on the Council's website.

**Contributor Reference:** 00365/1/001

**Customer Name:** Shea Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00366/1/001  
**Customer Name:** Ms Erin Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00367/1/001  
**Customer Name:** Mr Ben Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00095/2/001  
**Customer Name:** Mr Barry Richards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00368/1/001

**Customer Name:** Maria

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00364/1/001  
**Customer Name:** Ms Carole Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00369/1/001  
**Customer Name:** Mr Alfred Roger Seear

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00370/1/001

**Customer Name:** Mrs Jennifer Fletcher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00371/1/001

**Customer Name:** Mr Roland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00372/1/001  
**Customer Name:** Ms Michelle Jamieson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00356/1/001  
**Customer Name:** Mr Roly Fletcher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00357/1/001  
**Customer Name:** Mr Michael Walton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00360/1/001  
**Customer Name:** Mr David Chappell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00362/1/001  
**Customer Name:** Ms Louise Sutherland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00363/1/001  
**Customer Name:** Mr Ciaran Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00350/1/001  
**Customer Name:** Mr Phil Peakin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00351/1/001  
**Customer Name:** Mrs Carolyn Peakin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00352/1/001  
**Customer Name:** Mr Steven Downham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00353/2/001  
**Customer Name:** Mrs Amanda Downham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00354/1/001  
**Customer Name:** Ms Katy Gravett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00197/2/001  
**Customer Name:** Ms Marianne Meinke

### **Summary of representation:**

Agrees with the objections raised by the Woodham and Horsell Neighbourhood Forum, with the following specific objections relating to the immediate area:

#### **Communication**

Consultation is not wide enough – too few people in the area are aware of it. The consultation exercise is unsatisfactory and does not bring the plan to the attention of those whose homes are in Maybury, Oriental, Pembroke, College and other roads.

#### **Fairness**

The plan treats the less well off who live in the area with little thought. Many people living in smaller homes find themselves badly affected by congested roads. Many homes have little or no garden to protect those who live there from noise and pollution. People rely on a Council to care for their interests. If this plan goes ahead it is showing little or no regard for those people who are unsure how to navigate through the council's formal systems and processes. Some people will be challenged by the fact that English is a second language.

#### **Traffic issues**

– pinch points: the plan will worsen traffic pinch points where roads are not fit for purpose. The addition of 1,000+ cars will add to an already appalling road infrastructure in parts of Woodham, Sheerwater and Maybury. Traffic in Old Woking, Maybury, Oriental, Pembroke, College and other roads has increased significantly whilst road conditions have not improved. There have been no improvements despite the Joint Committee being made aware of the issues. There is now a significant rush hour to contend with.

– dangerous roads and junctions: the development would add to the issues with dangerous roads and congested junctions, such as Sixways, East Hill/Old Woking Road, Maybury Hill/Old Woking Road. Pembroke Road will see challenges with the junction with White Rose Lane. Accidents are not uncommon. The use of local residential roads as cut throughs will increase. Pedestrians will find it increasingly difficult to cross roads with a further increase in traffic.

– traffic at Lion Retail Park: The Lion Retail Park is surrounded by pinch points; one is used to access parking for the Mosque and also for traffic using the shops at the Lion Retail Park. Formerly the site housed a DIY store. Since Asda arrived cars routinely queue to enter and exit the car park. This angers those who want to drive straight on and there have been assaults. Crossing the roads to enter the site can be difficult for pedestrians. Pedestrians have been injured at the site.

– deaths: in December 2016 a pedestrian was killed in Monument Road after being hit by a car involved in an earlier collision. Previously a little Muslim child died. At that time Councillor Evans advised that there should be a round table meeting in respect of areas of neglect between Monument Bridge and Oriental Road. Pavements are still too narrow throughout, but particularly under the bridge in Monument Road.

– safety: at the time of the accident in 2001 Cllr Evans said the major road through the heart of Maybury was not pedestrian friendly and gave no pride in the place. The area was unattractive and in poor condition. There was, she said, an urgent need to improve safety. It was to be upgraded to a village. David Bittlestone replied that the Council should be doing something. It

was, he said, an opportunity to look at it and come up with things that may not cost money. My home is adjacent to the area. There is a bit of grass around the Lion Retail Park but a busy Asda store and Costa coffee shop have increased traffic and so danger. A doctor's surgery adds to traffic problems at the roundabout between Maybury and College Road. In Monument Road a food takeaway has been allowed. There is more litter and more and faster traffic. The area remains unloved and challenging for drivers, cyclists and pedestrians.

– road infrastructure/safety at Oriental Road and Monument Bridge: these roads are too congested. There are plans to build a dense development on the station car park. Mothers with young children now complain about safety because the pavement on the St Dunstan's side is narrow, trees are overgrown and vehicles go too fast. Another development is planned at Britannia Wharf and, to add to the mix, something is doubtless planned for the grey building on Monument Bridge. Canal development has been mooted but nothing has been said about road improvements. Schoolchildren walk up Monument Road to the Railway Home in an already busy road situation. To avoid unfairness these issues must be considered as part of this consultation.

– public transport: Buses are infrequent and there is no longer a bus service into town along Oriental Road so transport will be by car. Many people are not sufficiently confident to cycle on these narrow roads.

– congestion: the area around Martyrs Lane is already congested and traffic for the tip queues back to the main roads at either end. Additional homes here will worsen this.

– Sheerwater: the Sheerwater development will increase the number of homes and so cars, bringing greater congestion to the A320, Old Woking Road, East and Maybury Hills, Oriental, College and Monument Roads. When combined with the Martyrs Lane development it is untenable.

#### Pollution and air quality

The proposal will not help reduce air pollution in the area. Poor air quality is detrimental to everyone, particularly, children, the elderly and those in poor health. Council air quality measurement systems have proved inconsistent in Oriental Road with failed readings being not uncommon. There are schools in Onslow Crescent. Woking and Bernard Sunley homes are in the locality. Air quality has deteriorated here. There is also light pollution in many areas, including significant lighting from Lion Retail Park. The Martyrs Lane site lighting would add to the effect removing any change of people seeing a real night sky and add to the challenges.

#### Health

Health walks occur in Woking and these welcome anyone but include people referred by GPs due to illness. The pollution as one crosses the A320 is really disgusting. The Horsell route to the Muslim burial ground exiting at Monument Bridge is not nice as the air can be thick with diesel fumes at Monument Bridge.

#### Surface water

When it rains, water lies on the surface of the road and pavements in Oriental Road. The road has become an increasingly busy thoroughfare to town and the railway station and is used by emergency vehicles. Pedestrians walking on the pavement must dodge the puddles and cars that pass by to avoid being soaked by filthy rainwater. Cyclists are also badly affected. Walking the length of the road in wet weather (particularly on the St Paul's Church side) will be an even more unpleasant and fraught experience should traffic increase due to 1000 new

homes at Martyrs Lane. It will encourage those of us who now walk into town to drive in, which will in turn create more parking issues.

#### New properties and shared occupancy

There has been much infill building already with no consideration for pedestrians. More homes are needed but putting them all in one place will saturate the area with people and traffic. It is grossly unfair to build a large estate on a side of town that is densely populated. Properties should be spread across the Borough to achieve balance. Many homes in Oriental Road are shared and there are too many vehicles for available parking. Many of the new homes planned for Martyrs Lane will be shared occupancy as they will be purchased to let. Rents in this area are too high for many individuals.

#### Green space

There is insufficient green space on this side of town and no play area in the Oriental/Maybury Road area for children to play safely. Woods are not safe places for children. Many gardens are small. This development would create more overcrowding. At a past meeting of the Woking Joint Committee Cllr Kingsbury undertook to look into the provision of a play area but no progress so far. This plan reduces fresh air opportunities.

#### Construction Vehicles

Access via the A 320 would add to congestion. The recent roadworks were an excellent demonstration of potential traffic chaos during construction, road or utility repairs.

#### Policing

Police are under resourced. They are rarely evident in this area, unless passing through. A site of this size would add to the challenges.

#### School Transport Plans

These bring to our roads more vehicles. People travelling from outside areas bring pupils in to Woking to meet school buses going elsewhere. It seems that the Lion Retail Park and adjacent car parks are felt to have no maximum capacity and the effect on nearby residents is not considered.

#### Road repairs

I have previously received apologies from Surrey CC after investigations into the unacceptably long time taken for contractors to repair broken drains and undertake other work in Oriental Road, etc. Reasons included the level of traffic on the road delaying commencement, tardy issue of permits to work due to the needs of the Mosque, church and shops. Repairs will take longer if the plan goes ahead as footfall to the venues will increase.

#### Commerce and connection to Heathrow

The airport coach passes along Oriental Road to the airport via Sixways roundabout. More traffic will produce challenges for Heathrow Express in keeping coaches on time and this in turn will discourage companies locating or remaining here. The Woking to Heathrow trip is currently attractive as a benefit for employers and employees. This development would negate the benefit to business.

#### **Officer Response:**

The objections to the proposal as set out in the representation are noted and will weight in the balance of considerations by Members.

The minimum level of public consultation required for a Regulation 18 consultation on a draft Development Plan Document such as the Site Allocation Development Plan Document (DPD) is prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has also published a Statement of Community Involvement setting out how the community will be involved in the preparation of key planning policy documents. Although this latest round of consultation was not a 'formal stage' in the plan preparation process, the Council has ensured that a similar degree of consultation has taken place to that of the Regulation 18 stage, including sending direct mails to over 2,000 individuals or organisations on the consultation database (from all areas of the Borough), making consultation documents available in local libraries as well as on the internet; holding open days for the public; publishing press notices and news releases in the local newspapers and attending public meetings to discuss the issues. The Council is satisfied that it has done what it can within the available resources to engage the community during this latest round of consultation. It has done so in accordance with the Statement of Community Involvement and all other statutory and policy requirements. All of the Council's Local Development Documents can be made available, on request, in other formats if needed. The Council also recognises that it is important to include those that are seldom heard in the planning process (see paragraph 1.22 of the Statement of Community Involvement). A range of techniques are used to encourage hard-to-reach groups to participate in the plan-making process.

Issues associated with the Lion Retail Park and surrounding areas are outside the scope of this consultation exercise. The Council does, however, recognise that the traffic impacts associated with development can have effects on other parts of the Borough. The Council is fully aware of local resident's concern about the existing traffic conditions and safety on various transport routes and takes those concerns seriously. In this regard, the Council has carried out the following separate studies to quantify and forecast vehicular trips that would be generated by various development options to enable the delivery of the Core Strategy and future development needs, and to help determine appropriate mitigation to address the adverse impacts of the development:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including the development at Sheerwater. The development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine site specific mitigation measure that would be necessary to bring forward the development. Any transport assessment will take into account background traffic

generated by the existing uses on the site, including the recycling centre. Any development will need to meet the criteria under policy CS18 Transport and accessibility, which ensure development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts (direct or cumulative).

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

Air quality in Woking Borough is generally good and in the main meets national air quality standards. The Council assesses air quality in the Borough on a regular basis and if standards are not met, the area is declared an 'Air Quality Management Area'. Currently there is only one AQMA in Knaphill. The Council has recently adopted the Development Management Policies DPD. This contains a suite of policies for 'a healthy built environment'. Any development proposals on allocated land must meet the requirements in these policies in order to be supported by the Council, ensuring that there are no unacceptable impacts on air quality and health and safety of the public. Large developments must submit an Air Quality Assessment, identifying the change in air quality that will result from the proposed development and an appropriate scheme of mitigation.

The Council attaches significant importance to flood risk – including that of surface water flooding – because of its potential threat to the livelihood of residents and local businesses. In this regard, sites are allocated in areas with the lowest probability of flooding from all sources. Where relevant, the key requirements of the proposed allocated sites sets out conditions for the need for a detailed flood risk assessment. This ensures that the development of any site addresses any site specific issues relating to flood risk, including making sure that the development of the site does not exacerbate flood risk elsewhere. Sustainable Urban Drainage Systems (SUDS) are required for major development, which help minimise the risk of flooding – in particular, flooding due to surface water run-off. Policy CS9: Flooding and water management, of the Core Strategy, sets out robust policy requirements for managing the impacts of development on flood risk. This will apply when determining any application that will come forward on any of the allocated sites.

The spatial strategy of the Core Strategy seeks to focus most new development in the main centres which have a range of services and facilities to minimise the need to travel. The draft Site Allocations DPD reflects this strategy. It is also agreed that Green Belt land will be released to meet future development needs between 2022 and 2040. For the Site Allocations DPD to be found sound, the Council has to identify the most sustainable land to meet its future development needs. This must be the most sustainable when compared with all other reasonable alternatives. A lot of studies have been undertaken to enable the Council to make an informed decision on this matter. The spatial distribution of development is therefore driven by sustainability and not by Ward boundaries, or by existing population density. However, the Council did take into account the population profile, likely average property price

and average monthly rent of units whilst assessing sites against the Sustainability Appraisal Framework, in order to provide housing which meets the needs of the community and which is at an affordable price. It is also worth noting that policy CS12: Affordable Housing, would apply to any development coming forward be it at Martyrs Lane or the six other sites.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. The Community Infrastructure Levy and Section 106 contributions will provide significant funding for the infrastructure necessary to support the development of the Martyrs Lane site, and this would include the provision of suitable green space. Policy CS17 of the Core Strategy requires on-site provision of open space and green infrastructure for larger sites. Additional infrastructure requirements could potentially include the improvement of public transport infrastructure provision, such as bus services. As part of the evidence base for preparing the Site Allocations DPD, the Council prepares an Infrastructure Delivery Plan (IDP). The Council consults with many infrastructure providers, including the Police, on the capacity to provide services for proposed sites. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

Any planning approval for a major development would be accompanied by a series of planning conditions, including those requiring various details to be submitted to the Council about construction methods, and submitting a Construction Management Plan. Applicants would have to discharge these conditions as part of gaining approval for the development. The Council does accept, however, that a degree of disruption may be caused by the development of allocated land – although this would occur irrespective of whether it is at Martyrs Lane or the six original sites.

**Contributor Reference:** 02687/1/001  
**Customer Name:** Mr Stewart Mison

**Summary of representation:**

As a resident of Saunders Lane against GB10 and GB11. The sites are unsuitable without major infrastructure changes which would destroy the countryside. The lanes are not suitable for more traffic. There are restrictions in the railway and single lane, weight restricted bridges. Although the Council says these concerns rest with the County Council and not Woking, they need to be considered by the Council. Mayford has no infrastructure to service such development, from local transport to village shops.

Land in Pyrford and Byfleet offer better alternatives, but development here will also destroy and disrupt communities.

The Martyrs Lane site is bounded by good road links with connect quickly to the Town Centre and the motorway, without too many existing restrictions. It will have less environmental impact to residents. The site could look to link/share new amenities with Fair Oaks and Long Cross proposals.

Opposed to further destruction of communities.

**Officer Response:**

Support for Martyrs Lane is noted, and the merits as put forward in the representation will weigh in the balance of considerations by Members.

The Regulation 18 consultation Issues and Matters Topic Paper sets out a detailed response to concerns regarding the originally proposed sites, including those in Mayford. Section 3 in particular sets out how adequate infrastructure, including transport infrastructure, will be provided to support the Site Allocations DPD. Section F also addresses this issue, particularly for Mayford.

Section 24 also sets out how the Council is working in partnership with the County Council in assessing transport impacts, rather than 'delegating' consideration to them as a Highways matter.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including the Martyrs Lane site.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

As emphasised above, the Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land it safeguards will avoid or mitigate impacts to the environment as far as possible. The Development Plan for the area has several planning policies that aim to protect and enhance the environment of the Borough, particularly policies CS7 Biodiversity and nature conservation; CS8 Thames Basin Heaths Special Protection Areas; CS17 Open space, green infrastructure, sport and recreation; and

CS24 Woking's landscape and townscape. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by environmental constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect features of environmental value, within and in close proximity to any of the sites being consulted.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land being considered can be protected.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The suggestion made in the representation to share or link new amenities with nearby development is welcomed and will be discussed with neighbouring boroughs should the Martyrs Lane site be safeguarded.

**Contributor Reference:** 00349/1/001  
**Customer Name:** Ms Tracy Pryce

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02686/1/001  
**Customer Name:** Mrs S A Palmer

**Summary of representation:**

Objects to the Martyrs Lane proposal and to the original proposals to develop sites in Pyrford.

The New Zealand Golf Course is one of the most famous in England and is over 100 years old. It's a very good way to use the land as people can play into old age and keep fit. Unlike Fair Oaks aerodrome the golf course maintains itself.

If the Government continues to bully the Council we shall end up like another suburb with no green spaces left.

The fields in Pyrford create a break between Pyrford Court and the road to Ripley. Pyrford is already overloaded with traffic; it is difficult to park at the shops and sometimes impossible to drive along the road past the church. No more homes please.

Wisley Airfield would be more appropriate.

**Officer Response:**

The Council acknowledges that the golf club is a significant landowner within the Martyrs Lane site and has received confirmation from the club that the land in its ownership will not be made available for future development proposals of the Council. The availability of the land is a material consideration for the future deliverability of the land as per guidance in the National Planning Policy Framework. However, if the Council decides on the available evidence that the land is the most sustainable to meet the future development needs of the Borough, the lack of availability of parts of the land should not be an absolute constraint to the development of the entire land. The Council has Compulsory Purchase Powers that it could choose to use to acquire land for common good. The historic and recreational significance of the golf course is noted, and will be one of the factors that has to weigh in the balance when the Council makes its decision on the matter. In addition, as part of this consultation, Sport England has been consulted on the proposal and their representation and the Council's response can be accessed for further information.

It is noted in the Core Strategy that a key issue is the need to identify sufficient land that is available and suitable in sustainable locations to meet all types of housing need. Another challenge is to protect the Borough's valuable green, open spaces from the growing pressure for further development that cannot all be accommodated within the urban area and/or on previously developed sites. A Green Belt boundary review (by Peter Brett) was conducted to recommend the release of Green Belt land for development that does not undermine the overall purpose and integrity of the Green Belt.

The Green Belt boundary review report recommends that the land to the rear of 79 – 95 Lovelace Drive, Teggs Lane should be allocated for development. It makes this recommendation after acknowledging the references made in the representation about the contribution the site makes to the separation between urban areas. Detailed analysis and reasons for this recommendation are set out in paragraphs 4.3.10 – 4.3.11 of the report. Specific attention is drawn to following key conclusions 'the assessment of parcel 9 against the fulfilment of Green Belt purposes shows that the area fulfils a critical role in respect of Purposes 1 – 3 and has low to very low suitability as an area of search. The assessment of Landscape Character notes that the area has little/no or low capacity to accommodate change. This is a reflection of the open exposed nature of much of the parcel, and the contribution that it provides in terms of the town's setting. However, the north western part is less sensitive – it is set back from the exposed slopes and edge of the ridge and benefits from significant containment provided by a substantial tree belt along Upshot Lane just beyond the ridge top. Whilst the existing Green Belt boundary is well defined, sound alternative boundaries exist along the Upshot Lane and Pyrford Common Road'. In terms of its potential sustainability, the site is well located in close proximity to local community facilities. It lies adjacent to a village hall and scout hut, and close to a school, church and nursery. It is also within 500m from the neighbourhood centre of Pyrford. Overall, the site is considered to be suitable in sustainability terms.

The report, whilst clearly acknowledging the general comments about parcel 9, singles out the land to the rear of 79 – 95 Lovelace Drive as suitable for allocation. The decision to safeguard the land in the draft Site Allocations DPD is therefore well evidenced.

The Council has also carried out a sustainability appraisal to provide the necessary evidence to justify the relative sustainability for safeguarding the land east of Upshot Lane and south of Aviary Road. This evidence should be balanced with the evidence received from the representations to the Martyrs Lane consultation to determine the right approach to safeguarding.

Peter Brett's report assesses the land east of Martyrs Lane as parcel 2. Detailed conclusions about the site are set out in paragraph 3.5.11. Overall, the report concludes that the removal of any part of the land would leave an area of development unconnected to the urban area, and is not recommended for removal from the Green Belt.

The Council fully understands the concern about the level of traffic experienced by people and the potential for this to be exacerbated by the traffic implications of developing the originally proposed sites. The Regulation 18 Issues and Matters Topic Paper sets out a detailed response (under Sections 3, 20, V and U) to traffic concerns relating to the original proposed safeguarded sites.

Transport studies conducted in partnership with Surrey County Council to inform the preparation of the Site Allocations DPD recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine

any site specific mitigation measures that would be necessary to bring forward the development.

It should be noted that Wisley Airfield is not within Woking Borough and as such can not be allocated for development by the Council. This is a matter for Guildford Borough Council.

**Contributor Reference:** 00337/1/001  
**Customer Name:** Natural England

**Summary of representation:**

Summary of representation can be found in the Duty to Cooperate Bodies Topic Paper

**Officer Response:**

The Council's response can be found in the Duty to Cooperate Bodies Topic Paper.

**Contributor Reference:** 00332/1/001  
**Customer Name:** Mr Steve Sullivan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00333/1/001  
**Customer Name:** Ms Shiela McAree

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00334/1/001  
**Customer Name:** Ms Sally Moses

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00335/1/001  
**Customer Name:** Ms Naida Blower

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00336/1/001  
**Customer Name:** Mr Dan Fletcher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00338/1/001  
**Customer Name:** Mr Peter Redman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00339/1/001  
**Customer Name:** Mr George Rowland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00340/1/001  
**Customer Name:** Mrs Daphne Rowland

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00341/1/001  
**Customer Name:** Mr Robert Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00342/1/001  
**Customer Name:** Mr Alexander Stephens

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00343/1/001  
**Customer Name:** Ms Julia Cherry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00101/2/001

**Customer Name:** Mr Bill Bruno

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00345/1/001  
**Customer Name:** Ms Sharon Cooper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00346/1/001  
**Customer Name:** Mr Cliff Powell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00347/1/001  
**Customer Name:** Ms Ailsa Hughes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00348/1/001  
**Customer Name:** Mr Nigel Eastment

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02688/1/001

**Customer Name:** Ms Lyn Mison

**Summary of representation:**

As a resident of Saunders Lane against GB10 and GB11. The sites are unsuitable without major infrastructure changes which would destroy the countryside. The lanes are not suitable for more traffic. There are restrictions in the railway and single lane, weight restricted bridges. Although the Council says these concerns rest with the County Council and not Woking, they need to be considered by the Council. Mayford has no infrastructure to service such development, from local transport to village shops.

Land in Pyrford and Byfleet offer better alternatives, but development here will also destroy and disrupt communities.

The Martyrs Lane site is bounded by good road links with connect quickly to the Town Centre and the motorway, without too many existing restrictions. It will have less environmental impact to residents. The site could look to link/share new amenities with Fair Oaks and Long Cross proposals.

Opposed to further destruction of communities.

**Officer Response:**

Support for Martyrs Lane is noted, and the merits as put forward in the representation will weigh in the balance of considerations by Members.

The Regulation 18 consultation Issues and Matters Topic Paper sets out a detailed response to concerns regarding the originally proposed sites, including those in Mayford. Section 3 in particular sets out how adequate infrastructure, including transport infrastructure, will be provided to support the Site Allocations DPD. Section F also addresses this issue, particularly for Mayford.

Section 24 also sets out how the Council is working in partnership with the County Council in assessing transport impacts, rather than 'delegating' consideration to them as a Highways matter.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development, including the Martyrs Lane site.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

As emphasised above, the Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land it safeguards will avoid or mitigate impacts to the environment as far as possible. The Development Plan for the area has several planning policies that aim to protect and enhance the environment of the Borough, particularly policies CS7 Biodiversity and nature conservation; CS8 Thames Basin Heaths Special Protection Areas; CS17 Open space, green infrastructure, sport and recreation; and

CS24 Woking's landscape and townscape. Neither the land east of Martyrs Lane nor the six safeguarded sites are covered by environmental constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect features of environmental value, within and in close proximity to any of the sites being consulted.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land being considered can be protected.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The suggestion made in the representation to share or link new amenities with nearby development is welcomed and will be discussed with neighbouring boroughs should the Martyrs Lane site be safeguarded.

**Contributor Reference:** 02689/1/001  
**Customer Name:** Mrs Sylvia Murphy

**Summary of representation:**

Support the Martyrs Lane proposal

The proposals to develop on Martyrs Lane site or the Saunders Lane site is no contest.

The Martyrs Lane site would be large enough for the project and to provide all the necessary infrastructure

It is close to major employers

The site is served by public transport

The site has access to the A320 via a roundabout and onto the M25 and Woking Town Centre

Congestion on A320 to the South of Woking, also Egley Road and Mayford roundabout

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16:

Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00304/1/001  
**Customer Name:** Ms Diane Bramley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02691/1/001  
**Customer Name:** Cllr Laurence Keeley

**Summary of representation:**

Would like to recommend all sites.

Lifestyle is causing mental health issues and stress, the current housing system causes problems for people with a single income or if a couple and both have to work the children suffers. Need a new way to house ourselves with affordable homes by creating a community land trust for housing and not growth, through sustainability and well being.

The treatment of agricultural land and value needs to be looked at.

Social care and the cost of a home.

Compulsory Purchase of land.

Identify land for affordable housing. Community Land trust does not build for profit. It builds to provide houses that people can afford.

Rent is lower and affordable and the trust will sell houses at cost and will re-purchase when owners want to move on.

This provides a much less stressful environment and the trust can provide sports and community activities

In flood zones the properties can be built on steel frames and use sheep's wool for insulation.

New developments should have open space, community garden, allotments, sport pitches, school, doctors, library and community dining room.

Elderly accommodation with carers on site. Need for Council social care plan and not private

Pensions to be invested to get a pay out.

Affordable care homes and accommodation for young people coming out of care, prisoners, domestic violence and couples fostering.

Population growth outstrips food production.

Reduce the working week, offer flexible time, job share, work from home and reduce the need for travel

Development land tax on building land. This tax could pay for infrastructure needed for the development.

**Officer Response:**

Many of the issues raised fall outside the scope of this consultation.

The Core Strategy and the Development Management Policies DPD contains robust policies, to ensure sustainability and well being. Particular reference is made to CS12 – Affordable housing, CS13 – Older people and vulnerable groups, CS17 – Open space, green infrastructure, sport and recreation, CS19 – Social and community infrastructure, CS25 – Presumption in favour of sustainable development of the Core Strategy and DM1: Green Infrastructure Opportunities, DM2: Trees and Landscaping, DM3: Facilities for Outdoor Sport and Outdoor Recreation, DM5: Environmental Pollution, DM6: Air and Water Quality, DM7: Noise and Light Pollution, DM8: Land Contamination and Hazards, DM12: Self Build and Custom Build Houses, DM21: Education Facilities and DM22: Communications Infrastructure of the Development Management Policies DPD.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability.

Regarding the representation relating to specialist accommodation, it should be noted that Core Strategy Policy CS13: Older people and vulnerable groups, sets out how the Council will facilitate the delivery of specialist accommodation in the borough. This includes accommodation for the most vulnerable members of the community.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the

safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

As part of the Site allocations DPD sites were allocated for affordable housing this can be found on the Council website.

The Council can bring forward the development of land by using its Compulsory Purchase Powers. This is something that Members may wish to consider if it concludes that the land is the most sustainable when compared with the original six safeguarded sites.

Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding.

In terms of school and health care provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Development Management Policies DPD contains Policy DM12: Self-build and custom-build houses. The Council will support in principle the development of self and custom-build homes and custom-build projects in suitable locations, where they support the delivery of the Core Strategy and meet all other requirements of the Development Plan for the area. The Council has a Self Build and Custom Housebuilding Register to help establish the level of need in the Borough, and will also be informed by future reviews of the Strategic Housing Market Assessment. Each application for this particular type of housing will be determined on its individual merits. The Council particularly encourages applications from community-based custom-build projects and will use its existing evidence base such as the Strategic Housing Land Availability Assessment to help applicants to identify suitable sites.

**Contributor Reference:** 00320/1/001  
**Customer Name:** Mr Norman Johns

**Summary of representation:**

Concerns with the impact on the mature woodland in the site. If part of the land is considered I would strongly recommend a clearance area around the woodlands of at least 200m.

**Officer Response:**

The Council is aware of the existing designated Ancient Woodward towards the northern end of the land. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees. This is highlighted in the Housing White Paper. This particular Ancient Woodland is designated on the Council Proposals Map for protection. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss. At the development management stage surveys will be required. The surveys will make sure that those trees and other features of environmental and amenity significance are fully assessed and protected from development, where necessary.

**Contributor Reference:** 02136/1/001  
**Customer Name:** Ms Kate Stump

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02055/1/001  
**Customer Name:** Mr Mark French

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00305/1/001  
**Customer Name:** Mr Peter Barnes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00306/1/001  
**Customer Name:** Safia Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00307/1/001  
**Customer Name:** Mr Alex Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00308/1/001  
**Customer Name:** Mr Jenson Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00309/1/001  
**Customer Name:** Ms Sylvia Leahy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00310/1/001  
**Customer Name:** Mr Roland Home

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00311/1/001  
**Customer Name:** Ms Gemma Richmond

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00312/1/001  
**Customer Name:** Ms Siobhan Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00313/1/001  
**Customer Name:** Ms Janet Clarke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00314/1/001  
**Customer Name:** Mr Tim Chetwood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00315/1/001  
**Customer Name:** Mr Martin Bowman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00316/1/001  
**Customer Name:** Mr Wayne Suddaby

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00317/1/001

**Customer Name:** Mr Tony Hollingsbee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00318/1/001  
**Customer Name:** Mr Chris Pollard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00319/1/001  
**Customer Name:** Ms Madeleine Shillaker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00321/1/001  
**Customer Name:** Mr Tom Shillaker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00322/1/001  
**Customer Name:** Ms Marguerite Alker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00323/1/001  
**Customer Name:** Ms Lorna Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00324/1/001  
**Customer Name:** Mr John Simpson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00325/1/001  
**Customer Name:** Mr Alastair Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00326/1/001  
**Customer Name:** Jamie Wynne-Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00327/1/001  
**Customer Name:** Ms Eve Michaelis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00328/1/001

**Customer Name:** Ms Julie Last

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00329/1/001

**Customer Name:** Doug

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00330/1/001  
**Customer Name:** Mr Richard Bennett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00331/1/001

**Customer Name:** Jo Nigrelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00295/1/001

**Customer Name:** G R Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00296/1/001

**Customer Name:** Mrs J Rubin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00297/1/001  
**Customer Name:** Mr Mark Guthrie

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00298/1/001  
**Customer Name:** Ms Esther Waplinton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00299/1/001  
**Customer Name:** Ms Debbie Nicholson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00300/1/001  
**Customer Name:** Ms Carrie Price

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00301/1/001  
**Customer Name:** Ms Victoria Sullivan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00302/1/001  
**Customer Name:** Ms Deborah Lynn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00303/1/001  
**Customer Name:** Mr Jeff Smeeton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02690/2/001  
**Customer Name:** Ms Elizabeth Pocknell

**Summary of representation:**

Too many houses on a single site

Doctors surgeries and local hospitals are at capacity

Insufficient Schools in the area

Traffic impact on the roads and A320

Impact on environment and Horsell common, wildlife, birds and insects.

Disruption to local people , devalue houses, pollution and stress

Smaller blocks around the borough is better with affordable homes.

**Officer Response:**

It is acknowledged that the site as a whole is of sufficient size to enable the delivery of 1200 new homes. As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process,

the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of school provision, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

The Infrastructure Delivery Plan notes that at present there is adequate GP provision to meet overall demand in the Borough. Whilst this is the case, it is also accepted that there might be locally specific pressures of over subscription that needs to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is seeking to work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

The Council's response to the issues of traffic and wildlife can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the

Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

Whilst the value of land and property is not a material planning consideration, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

The social and environmental implications of the development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution. These would be considered at the Development Management stage.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

**Contributor Reference:** 00262/1/001

**Customer Name:** Leslie Phillips

**Summary of representation:**

Support for development at Martyrs Lane and understand that there will be suitable infrastructure and will be self contained. The land is not prime agricultural land and the surrounding roads can be widened to cope with the extra traffic. This is preferred than small piecemeal developments dotted around with inadequate infrastructure and facilities.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

In terms of the roads and traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Whilst it is correct that the site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

**Contributor Reference:** 00294/1/001  
**Customer Name:** Mr Chris Boylett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00284/1/001  
**Customer Name:** Ms Vanessa Brace

**Summary of representation:**

The proposed location is too near to the proposed development at Fair Oaks Airport and at Longcross. All three developments will concentrate additional traffic onto the strategic A320 road north of Woking which without drastic improvements will not be able to cope. A secondary issue would be the impact on the A245 Woking to A3 Cobham route which is already badly congested through West Byfleet & Byfleet.

More generally developments of this nature and size within North West Surrey are wholly inappropriate without massive investment in the infrastructure, e.g. Roads, rail, schools, health centres & possibly another hospital, or expanding St. Peter's Hospital.

**Officer Response:**

The Council has carried out a Transport Assessment to quantify the vehicular trips that will be generated by development of the Martyrs Lane site. The assessment demonstrates that development at the site will exacerbate traffic conditions on the A320 corridor that will require appropriate mitigation. The Council is working with the County Council to identify the necessary measures of mitigation. The Council is aware of the potential developments at Longcross in Runnymede and Fair Oaks in Surrey Heath, which could also have traffic implications on the A320. At this stage, no cumulative transport assessment has been done to quantify the overall impact of these developments on the A320. However, the Council is working in partnership with Surrey Heath and Runnymede Borough Council and the County Council to carry out a strategic transport assessment of the developments, and in particular, their implications on the A320 with the view to identifying the mitigation that might be necessary to enable the sustainable development of the three major sites.

The Transport Assessment also identified the A245 as a key hot spot that will require appropriate mitigation for developing either the land east of Martyrs Lane or the other six sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites. The Council is satisfied that the sites can be developed with the necessary infrastructure to support their sustainable delivery.

**Contributor Reference:** 00292/1/001  
**Customer Name:** Mr Paul De Kock

### **Summary of representation:**

The proposal makes more sense than encroaching on the various villages for several reasons. Firstly there would be access to the M25 and A3 without extra traffic congestion within Woking Town itself and surrounding villages. Disruption of building works would be confined to one area of the Borough only. No encroachment of Common Land or wildlife habitats of said commons or major disruptions of several sites within the Borough. Planning consent exists within the Martyrs lane area already, hence not designated Green Belt. There are other Golf Courses which can serve the public. Some of the site proposed has had no viable use since WW2 and unless designated Common Land usage, the area is dormant.

### **Officer Response:**

In terms of road and traffic congestion, The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and

- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Martyrs Lane site is in close proximity to Horsell Common and the land could be wildlife rich. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

It is correct that the land within the Martyrs Lane site is not designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. However, it is not dormant and does contain existing structures and buildings, such as sports facilities,

agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

**Contributor Reference:** 00263/1/001  
**Customer Name:** Mr David Elliott

**Summary of representation:**

The proposal appears to be for 3500 new houses and associated 5000 cars. There is no additional infrastructure such as schools or medical centres to support the development. The density of the housing proposed would be unsustainable given the area and should be reduced. There is no additional road network provision and will increase the current congestion. This open space should not be developed upon and will harm the natural habitat of wildlife, fauna and flora. Development on current open land would increase the risk of surface water flooding.

**Officer Response:**

3500 new houses and 5000 cars is an incorrect statement. It is anticipated that the site is sufficient to enable the delivery of at least 1,200 net additional homes and the necessary green and other infrastructure to support the potential development of the site.

In terms of infrastructure such as schools and medical centres. The Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

In terms of transport provision, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various

development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of wildlife, fauna and flora the land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The site would have been designated as SPA by Natural England if any presence of Dartford Warbler and Nightjar were significant enough to justify designation. The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard. Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

In terms of the risk of flooding, Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. The land east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. By releasing Green Belt land for future development, the Council also has to make sure that there is a strong defensible Green Belt boundary. The areas of the land covered by Flood Zones 2 and 3 are included within the safeguarded designation to make sure that there is a strong defensible Green Belt boundary. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this. Based on the above, it is not envisaged that the occupants of the development on the site would face unacceptable risk of flooding. Insurance of properties that could be developed on the site

would not be adversely affected and the development of the site would not exacerbate flood risk elsewhere.

**Contributor Reference:** 00273/1/001  
**Customer Name:** Mrs Linda Kimber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00274/1/001

**Customer Name:** Mr Philip Cliff

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00244/1/001  
**Customer Name:** Ms Jill Wakefield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00245/1/001

**Customer Name:** Ms Tina Bose

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00246/1/001

**Customer Name:** Mr Philip Barr

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00247/1/001  
**Customer Name:** Ms Rosemary George

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00248/1/001  
**Customer Name:** Ms Holly Case

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00250/1/001  
**Customer Name:** Mr Chris Laws

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00251/1/001  
**Customer Name:** Ms Barbara Prowle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00252/1/001  
**Customer Name:** Ms Mary Catherine Fowler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00253/1/001  
**Customer Name:** Ms Penny Mills

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00254/1/001  
**Customer Name:** Mr Derrick Fowler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00255/1/001  
**Customer Name:** Mr Lewis Fudge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00256/1/001  
**Customer Name:** Miss Kate Robinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00257/1/001  
**Customer Name:** Ms Ann Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00258/1/001  
**Customer Name:** Ms Sally Staden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00259/1/001  
**Customer Name:** Ms Nicola Boyd

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00260/1/001  
**Customer Name:** Dr Robert Jenkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00261 /1/001  
**Customer Name:** Mrs Ewa Jenkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00264/1/001

**Customer Name:** Mrs S Roberts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00265/1/001  
**Customer Name:** Mrs Jean Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00266/1/001

**Customer Name:** Mr J Roberts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00267/1/001  
**Customer Name:** Mr Andrew Gray

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00268/1/001  
**Customer Name:** Mrs Helen Fudge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00269/1/001  
**Customer Name:** Ms Ursula Grainger

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00270/1/001  
**Customer Name:** Ms Susan Ryder

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00271/1/001

**Customer Name:** Mr Ken Ryder

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00272/1/001  
**Customer Name:** Mr Andrew Kimber

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00275/1/001

**Customer Name:** Mr Ray James

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00276/1/001  
**Customer Name:** Mrs Suzanne Cliff

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00277/1/001  
**Customer Name:** Lesley Johnson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00278/1/001  
**Customer Name:** Ms Elaine Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00279/1/001  
**Customer Name:** Mr Richard Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00280/1/001  
**Customer Name:** Mr Fergus Boyd

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00281/1/001  
**Customer Name:** Ms Fiona Le Brocq

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00282/1/001  
**Customer Name:** Ms Helen Taylor

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00283/1/001  
**Customer Name:** Mr Jonny Boylett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00285/1/001  
**Customer Name:** Ms Vicki Mans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00286/1/001  
**Customer Name:** Mr Andrew Allan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00287/1/001  
**Customer Name:** Ms Lynne Haynes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00288/1/001

**Customer Name:** Mr John Muir Fraser

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00289/1/001  
**Customer Name:** Mrs Della Stokes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00290/1/001  
**Customer Name:** Mrs Joan Mercier

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00291 /1 /001  
**Customer Name:** Mr Patrick Mercier

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00293/1/001

**Customer Name:** Ms Catherine Russell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00249/1/001  
**Customer Name:** Mr Richard Alder

**Summary of representation:**

The Martyrs Lane site is suitable for the development of a community with adequate facilities and infrastructure and the A320 towards the M25 has scope for some long-term upgrading.

**Officer Response:**

In terms of community and infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of roads, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in

particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00227/2/001  
**Customer Name:** Mr And Mrs D Ling

**Summary of representation:**

The Martyrs Lane site is designated as Green Belt and provides an area of countryside between the towns of Woking and Horsell and West Byfleet and Woodham. Thus presenting a break between the development of these settlements.

Development of this land will increase already heavy traffic gridlock and air pollution and congestion.

It will put considerable strain on public services which are already at capacity.

The site is not in close proximity to existing services and this will impact traffic and congestion further.

The land bordering the River Bourne is subject to flooding,

The Green Belt exists to stop the urban sprawl, and protect areas of natural beauty. This Green Belt must not be removed.

**Officer Response:**

The representation regarding urban sprawl as been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper. In particular, the Council's Landscape Assessment and Green Belt Review (2016) notes the distances between the Martyrs Lane site and existing settlements including Woodham and Ottershaw. The review, in short, notes that the site is of critical importance towards the purposes of Green Belt and in particular that the site has critical importance to the Green Belt with regard to urban sprawl and the prevention of towns merging. However the report also notes that the Bourne River and associated flood zone to the north acts as a very strong durable boundary in preventing incursion into the Green Belt.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and
- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The social and environmental implications of development, regardless of whether it is at Martyrs Lane or any of the other sites, will be fully assessed as part of the development

management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The representation regarding flooding and further information on infrastructure provision and funding can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

Regarding the representation on natural beauty, the Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 02886/1/001  
**Customer Name:** Ms Katherine Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02890/1/001  
**Customer Name:** Mr Graham Bisacre

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00227/1/001

**Customer Name:** Mr And Mrs D Ling

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02892/1/001  
**Customer Name:** Mr John Pearson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02893/1/001  
**Customer Name:** Drummond Field

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01982/1/001  
**Customer Name:** Mr Andrew Barnes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02896/1/001  
**Customer Name:** Ms Margaret Pearson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02898/1/001  
**Customer Name:** Ms Amanda Field

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02899/1/001  
**Customer Name:** Mr Michael Brown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02901/1/001  
**Customer Name:** Mr Michael Salmon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02903/1/001  
**Customer Name:** Mr Mark Mantell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00228/2/001  
**Customer Name:** Ms Liz Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00229/1/001  
**Customer Name:** Mr Jonathan Fudge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00230/1/001  
**Customer Name:** Mr Mark Clare

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00231/1/001  
**Customer Name:** Mr Nigel Readings

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00232/1/001  
**Customer Name:** Ms Clare Davies

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00233/1/001  
**Customer Name:** Ms Anne Camp

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00234/1/001  
**Customer Name:** Dr Kathy Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00235/1/001

**Customer Name:** Rebecca

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00236/1/001

**Customer Name:** Rhian Holmes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00237/1/001  
**Customer Name:** Ms Melanie Wilkinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00238/1/001  
**Customer Name:** Ms Sue McKeown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00239/1/001  
**Customer Name:** Ms Amy Anjum

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00240/1/001  
**Customer Name:** Mr John McKeown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00242/1/001  
**Customer Name:** Miss Katen Lewis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00243/1/001  
**Customer Name:** Mr Kiron Bose

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02863/1/001  
**Customer Name:** Mr Roger Parsons

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02864/1/001  
**Customer Name:** Mr Prakash Patel

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02866/1/001

**Customer Name:** Mr Boodia

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02867/1/001  
**Customer Name:** Mr Ian Underhill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02869/1/001  
**Customer Name:** Lesley Underhill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02871 /1 /001  
**Customer Name:** Ms Alison Tait

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02873/1/001

**Customer Name:** Ms Charlotte Thorpe–Stanley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02874/1/001  
**Customer Name:** Ms Pauline Langfield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02082/1/001  
**Customer Name:** Ms Claire Turner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02879/1/001  
**Customer Name:** Mr Steven Cookson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02882/1/001  
**Customer Name:** Ms Michelle Godwin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02884/1/001  
**Customer Name:** Mr Bernard Newnham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02888/1/001  
**Customer Name:** Ms Jean Bisacre

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02902/1/001  
**Customer Name:** Mr David Bridger

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02904/1/001  
**Customer Name:** Ms Lorraine Redrup

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02905/1/001

**Customer Name:** Mr Jim Kelly

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02907/1/001  
**Customer Name:** Mr John Hutton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02908/1/001  
**Customer Name:** Ms Emily Hawkesworth

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02909/1/001  
**Customer Name:** Ms Annabel Hitchin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02861/1/001  
**Customer Name:** Mr Michael Cumper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02862/1/001  
**Customer Name:** Ms Susan Widdup

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00131/2/001  
**Customer Name:** Mr Michael Widdup

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02865/1/001

**Customer Name:** Mrs And Mr Anna And Andrew Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02868/1/001  
**Customer Name:** Mr Toni Bowater

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02870/1/001  
**Customer Name:** Ms Carol Borghi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02872/1/001  
**Customer Name:** Mrs J Tortolani

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02875/1/001  
**Customer Name:** Mrs Katherine Hedges

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02876/1/001  
**Customer Name:** Mr John Moffat

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02877/1/001  
**Customer Name:** Mr Graham Flower

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02878/1/001  
**Customer Name:** Mr Tania Osner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01256/1/001  
**Customer Name:** Ms Linda Clarke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02880/1/001

**Customer Name:** Ms An Lee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02881/1/001  
**Customer Name:** Mr Neil Godfrey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02883/1/001  
**Customer Name:** Mr Tony Langford

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02885/1/001  
**Customer Name:** Ms Natasha Mantell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02887/1/001  
**Customer Name:** Mr Martin Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02889/1/001

**Customer Name:** Mr Paul Judd

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02891 /1 /001  
**Customer Name:** Mr George Alexander

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02894/1/001  
**Customer Name:** Ms Cathy Alexander

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02895/1/001  
**Customer Name:** Mr Jon Alexander

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02897/1/001  
**Customer Name:** Mr David Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02906/1/001  
**Customer Name:** Mr Bob Alexander

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02706/1/001  
**Customer Name:** Mr David Reeve Fell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

It is stupid to build housing on this area due to unsound ground – namely the structure of the land and flooding issues. Agreed that housing could be built on stilts but normal housing would be uninsurable and possibly no or limited mortgages available.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02707/1/001

**Customer Name:** N W Price

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02708/1/001  
**Customer Name:** Alexander Family

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02709/1/001  
**Customer Name:** Ms Julliet Amer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The special protection of Horsell Common would be detrimentally impacted by development on this land, due to increased footfall.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 01205/2/001  
**Customer Name:** Mr Brian Hamill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Light contamination pollution (harms wildlife)

Noise pollution. I have counted 61 birds species in my garden. Also I have had deer and stoat and hedgehog. Nearby I've have the rare Dart Ford Warbler.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

The environmental implications of any proposed development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

**Contributor Reference:** 02710/2/001  
**Customer Name:** Mr William Elsley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02711/1/001  
**Customer Name:** Mr Douglas Elsley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00201/2/001  
**Customer Name:** Frances Wood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Wildlife will be under threat.

There will be sink holes – hardly suitable for housing.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02693/1/001

**Customer Name:** L Johnson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02694/1/001  
**Customer Name:** Ms Evelyn Hopkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Particularly concerned that increased congestion on the A320 will have negative impact on A&E access to St Peter's Hospital.

Six Crossroads roundabout is already over-congested.

Martyrs Lane is unsuitable for increased traffic and has dangerous egress onto A245. A245 is already over-congested.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper, including assessment of traffic impacts on the A320 and A245 road network and surrounding areas.

It should be noted that the Council, in the draft Site Allocations DPD, allocated the Six Crossroad Roundabout for essential infrastructure improvements. It is anticipated that improvements to this key junction will improve traffic flows through this area regardless of whether development takes place at Martyrs Lane or any of the other six safeguarded sites.

**Contributor Reference:** 02695/1/001

**Customer Name:** Mr And Mrs Tony And Mary Box

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The impact upon Horsell Common and the habitat makes this proposal unsustainable.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 02696/1/001  
**Customer Name:** Mr Alan Hunwicks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02697/1/001  
**Customer Name:** Ms Janet Perrot

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Horsell Common SPA threatened.

Increased congestion of A320 because of other proposed developments.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper, including likely traffic impacts on the A320.

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 02698/1/001  
**Customer Name:** Ms Jennifer Emrys-Roberts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02699/1/001  
**Customer Name:** Mr Brian Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02700/1/001  
**Customer Name:** Ms Jennifer Bater

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02701/1/001  
**Customer Name:** Mr Colin Bater

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02960/1/001  
**Customer Name:** Mr Michael Parker

**Summary of representation:**

The proposal is the least disruptive to the general area.

**Officer Response:**

Support noted

**Contributor Reference:** 02961/1/001  
**Customer Name:** Mr Michael Hart

### **Summary of representation:**

In agreement to substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future needs of the borough between 2027 and 2040. Reasons include:

- Although the proposed Martyrs Lane site is in the green belt it has no additional national or local landscape designations, unlike for example the two sites on the Hook Heath escarpment (GB10 and GB11).
- The land is north of the New Zealand golf course and is largely derelict and disused.
- Planning permission was previously granted for McLaren to build a technology centre on part of the site. Therefore, there is a presumption that the land is suitable for development.
- The A320 is adjacent to the site providing easy access to the M25 and Heathrow Airport to the north, and Woking town centre and mainline railway station to the south without encountering the traffic delays experienced on the A320 south of Woking. Therefore, The Martyrs Lane proposal is a far better option than building south of Woking where the A320 is often at a standstill in the morning rush hour, and will increase once the new Hoe Valley School opens.
- Bus routes and cycle routes, including to Woking town centre already exist.
- There is little development along the A320 north of Woking, making road widening relatively easy if necessary.
- There are major employers nearby, e.g. St Peter's Hospital, the Animal and Plant Agency, and McLaren Technology Centre.
- A neighbourhood centre on the proposed site would provide additional employment opportunities.
- The site is large enough to accommodate 1200 houses, including affordable housing together with the necessary supporting infrastructure of shops, primary school, health centre, etc., without encroaching on the golf course.
- There are advantages in the creation of a single new housing estate rather than several dispersed small ones.
- It is much easier to create the new supporting associated infrastructure rather than overload the existing over-stretched facilities.
- It will also simplify the process for obtaining planning permission.
- Due to the size of the Martyrs Lane site there is scope and potential not only to build all the properties necessary, but even more if it subsequently turns out that more than 1200 are needed, or if there is a further requirement post 2040.
- Boundaries of the site are surrounded by a mixture of dense mature woodland that will reduce the impact of the development.
- Safeguarding this site now will mean that it could be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support is noted. The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the Hook Heath escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. Parcels of land north of the golf course were assessed as part of the Site Allocations DPD process, and ruled out as their development would lead to isolated development in the Green Belt (see paragraph 3.5.11 of Peter Brett's Green Belt Boundary Review report). This is why the Golf Course has now been included in the proposal.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made a representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along

the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. Policy CS12 of the Core Strategy on Affordable Housing would also apply to development at Martyrs Lane and the six other sites irrespective of their location or size (they will all result in over 10 dwellings per site and be subject to the policy criteria).

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02962/1/001  
**Customer Name:** Mrs Elaine Hart

### **Summary of representation:**

In agreement to substituting the land to the east of Martyrs Lane for the safeguarded sites identified in the draft Site Allocations DPD (in Byfleet, Mayford and Pyrford), to meet long term future needs of the borough between 2027 and 2040. Reasons include:

- Although the proposed Martyrs Lane site is in the green belt it has no additional national or local landscape designations, unlike for example the two sites on the Hook Heath escarpment (GB10 and GB11).
- The land is north of the New Zealand golf course and is largely derelict and disused.
- Planning permission was previously granted for McLaren to build a technology centre on part of the site. Therefore, there is a presumption that the land is suitable for development.
- The A320 is adjacent to the site providing easy access to the M25 and Heathrow Airport to the north, and Woking town centre and mainline railway station to the south without encountering the traffic delays experienced on the A320 south of Woking. Therefore, The Martyrs Lane proposal is a far better option than building south of Woking where the A320 is often at a standstill in the morning rush hour, and will increase once the new Hoe Valley School opens.
- Bus routes and cycle routes, including to Woking town centre already exist.
- There is little development along the A320 north of Woking, making road widening relatively easy if necessary.
- There are major employers nearby, e.g. St Peter's Hospital, the Animal and Plant Agency, and McLaren Technology Centre.
- A neighbourhood centre on the proposed site would provide additional employment opportunities.
- The site is large enough to accommodate 1200 houses, including affordable housing together with the necessary supporting infrastructure of shops, primary school, health centre, etc., without encroaching on the golf course.
- There are advantages in the creation of a single new housing estate rather than several dispersed small ones.
- It is much easier to create the new supporting associated infrastructure rather than overload the existing over-stretched facilities.
- It will also simplify the process for obtaining planning permission.
- Due to the size of the Martyrs Lane site there is scope and potential not only to build all the properties necessary, but even more if it subsequently turns out that more than 1200 are needed, or if there is a further requirement post 2040.
- Boundaries of the site are surrounded by a mixture of dense mature woodland that will reduce the impact of the development.
- Safeguarding this site now will mean that it could be taken into account in the redevelopment of Sheerwater.

## Officer Response:

Support is noted. The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

It is accepted that the Martyrs Lane site does not contain landscape constraints such as those on the Hook Heath escarpment, but it does in fact contain other development constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. Parcels of land north of the golf course were assessed as part of the Site Allocations DPD process, and ruled out as their development would lead to isolated development in the Green Belt (see paragraph 3.5.11 of Peter Brett's Green Belt Boundary Review report). This is why the Golf Course has now been included in the proposal.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made a representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along

the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

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The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

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The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. Policy CS12 of the Core Strategy on Affordable Housing would also apply to development at Martyrs Lane and the six other sites irrespective of their location or size (they will all result in over 10 dwellings per site and be subject to the policy criteria).

The Council will identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

It is accepted that the land east of Martyrs Lane is in close proximity to major employers. Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

It is correct that some of the land within the Martyrs Lane site contains existing structures and buildings. These include sports facilities, agricultural buildings and residential properties. Nevertheless the site is washed over by the Green Belt and the same exceptional circumstance test will equally apply as it will with the original six sites. The overriding consideration is identifying the most sustainable location for future development when compared against all other reasonable alternatives and not whether the land has been previously developed. Whilst it is a material consideration, it's not the primary one and is one of many material considerations to be considered. The Council notes the locational advantages of the Martyrs Lane site. The merits of the original six sites have already been given in the Officer's response to the Regulation 18 consultation Issues and Matters Topic Paper. These merits will be analysed to inform the Council's preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

If the Council were to decide to safeguard this site, its development will take into account any development proposals in the vicinity of the site, including the regeneration proposals at Sheerwater.

**Contributor Reference:** 02963/1/001  
**Customer Name:** Mehran Nikoo

**Summary of representation:**

Having multiple sites allows distribution of traffic through different routes and provides better integration with already formed communities. Allocating one large site on land to the east of Martyrs Lane puts huge pressure on one route – the A320. Given the route from the M25 to Woking is the main access route for emergency services, the additional traffic on a single lane main road puts additional lives at risk.

Furthermore, this area is home to birds and wildlife, and developing such a huge site will have a negative impact.

Preference would be for a smaller site. The current proposal would put huge pressure on one area, which is not a good idea.

**Officer Response:**

The Council has carried out a series of transport studies to determine the highway impacts for developing the sites identified for development. The studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites. Policy CS18 on Transport and accessibility in the Core Strategy sets out requirements for developments to ensure highway safety is maintained. In addition, each of the allocated sites – whether they be the six original sites or one large site – will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with Surrey County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. The work is ongoing and will be completed before the Site Allocations DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications for safeguarding the land east of Martyrs lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Site of Special Scientific Interest or common land. The site would have been designated as SPA if any presence of Dartford Warbler or Nightjar were significant enough to justify designation. The Core Strategy and Development Management DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development.

**Contributor Reference:** 01168/3/001

**Customer Name:** M Skilton

**Summary of representation:**

Against the proposal. Small pockets of land such as that at Byfleet, Mayford and Pyrford should be developed if there's a need to develop in the future.

**Officer Response:**

Objection noted. The justification for the release of Green Belt land for future development is set out in detail in Sections 1 and 2 of the Regulation 18 Issues and Matters Topic Paper.

**Contributor Reference:** 00296/2/001

**Customer Name:** Mrs J Rubin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02712/1/001

**Customer Name:** Ms Beryl Low

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The site also boards a protected site.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

In addition, it is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 02713/1/001

**Customer Name:** Mr Keith Low

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The site also borders a protected site.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

In addition, it is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

**Contributor Reference:** 02714/1/001

**Customer Name:** Mr And Mrs Alan And Sylvia Hunt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Development would be detrimental to Horsell Common SPA.

Local parking in West Byfleet and Woking is already at capacity.

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

In addition, it is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development.

The Council has Planning Policy and parking standards in place to ensure that new development provides the necessary parking provision to make the development acceptable and ensure highways safety. This is considered in detail at the Development Management stage. It should be noted that the Council has recently consulted on its updated Parking Standards and is in the process of adopting these new standards to ensure that local standards are in general conformity with national planning policy. The updated parking standards state that in areas with good public transport provision such as Woking town and West Byfleet district centre, a lower parking provision may be acceptable.

**Contributor Reference:** 01199/2/001  
**Customer Name:** Mr Derek Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The provision of the following infrastructure

New water/sewage services, Adequate car parking, Schools, Health centre/Dr's surgery, Shops

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01199/3/001  
**Customer Name:** Mr Derek Watts

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Water and sewage capacity for 3500 homes and the recycling centre cost millions of pounds of taxpayers money

**Officer Response:**

The Council's response to the representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Responses Topic Paper.

It should also be noted that the proposal is for 1200 homes on the Martyrs Lane site, this is clearly set out in the Land to the east of Martyrs Lane Consultation Document.

The Martyrs Lane Recycling Centre is not proposed to be allocated for development. The site has been included within the site area to form a defensible Green Belt boundary along Martyrs Lane. This is also clearly set out in the Land to the east of Martyrs Lane Consultation Document.

**Contributor Reference:** 02715/1/001  
**Customer Name:** Mr Mike S Holmberg

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02692/2/001  
**Customer Name:** Mrs S Holmberg

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02702/1/001

**Customer Name:** S A Edwardes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02703/1/001  
**Customer Name:** Mr Robin Perrot

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02704/1/001  
**Customer Name:** Mrs J C Borrham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02705/1/001

**Customer Name:** Mrs M J Coles

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02721/1/001

**Customer Name:** Thames Water Planning and Property

### **Summary of representation:**

The originally proposed sites have been assessed on an individual basis with only limited opportunity to consider cumulative impacts, therefore the impact of multiple sites may have greater impact. The scale, location and time to deliver any required network upgrades will be determined after receiving a clearer picture of location, type and scale of development, together with its phasing. Although of significant size, the land to the east of Martyrs Lane is the preferred option as it is more straightforward to plan for the necessary infrastructure than a number of smaller sites delivering the same number of houses.

A key sustainability objective for the preparation of Local Plans is for new development to be coordinated with the infrastructure it demands, and to take into account the capacity of existing infrastructure. The NPPF states "Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:...the provision of infrastructure for water supply and wastewater" (para.156). The NPPF goes on to state "Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment...take account of the need for strategic infrastructure including nationally significant infrastructure within their areas" (para.162).

The NPPG sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs: "adequate water and wastewater infrastructure is needed to support sustainable development" (para.001, ref ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. It is therefore important that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be delivered prior to any occupation of the development. Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:

- The developments demand for water supply and network infrastructure both on and off site and can it be met;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

-The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

**Officer Response:**

The merits of providing water supply and sewerage/wastewater infrastructure for one larger site as opposed to a number of smaller sites is noted and will weigh in the balance of considerations by Members.

The Council acknowledge the guidance in the NPPF and NPPG to facilitate the delivery of infrastructure. Policy CS16 of the Core Strategy states that the Council will work in partnership with infrastructure service providers to ensure the infrastructure needed to support development is provided. A definition of infrastructure is included under paragraph 5.132, which includes utility services: water supply and waste water treatment. Policy CS16 goes on to state that the necessary infrastructure must be provided on site for developments to be acceptable.

The Core Strategy and draft Site Allocations DPD are supported by an Infrastructure Delivery Plan (IDP) that sets out the capacity of existing infrastructure, the impact of development on that infrastructure, and the likely funding sources available to meet future needs. It also includes a schedule of infrastructure that is considered necessary to support the spatial strategy. The IDP is currently being updated and Thames Water has been contacted to contribute to this project, in particular to assess the quality and capacity of water/wastewater infrastructure for proposed site allocations across the Borough. This work is ongoing and will be completed before the DPD is submitted for 'Regulation 19' consultation. The Council will work with Thames Water to ensure that the necessary water supply and sewerage/wastewater infrastructure is delivered to support future housing growth, irrespective of whether it is via a single site or multiple sites.

In addition, the Sustainability Appraisal Framework against which each proposed site allocation was assessed for sustainability, contained at Objective 14 the aim to "maintain and improve water quality of the region's rivers and groundwater, and manage water resources sustainably". Decision-aiding questions included: would the development of the site i) support the efficient use of water resources, ii) operate within the existing capacities for water supply and wastewater treatment, and iii) provide adequate wastewater and sewerage infrastructure? The outcome of the Sustainability Appraisal was to include optimising/mitigating measures against various site allocations requiring the design of development to provide suitable wastewater and sewerage infrastructure. Each site allocation in the draft Site Allocations DPD consists of a set of 'key requirements' which should be met to achieve sustainable development. Where relevant, allocated sites will be required by planning policy to undertake detailed assessment to determine whether adequate water supply, wastewater and sewerage infrastructure will be delivered to support the development, and would not lead to problems for existing or new users.

**Contributor Reference:** 02964/1/001  
**Customer Name:** Ms Leanne Skilton

**Summary of representation:**

Against the proposal. Against development of land to the east of Martyrs Lane.

**Officer Response:**

Objection noted.

**Contributor Reference:** 02921/1/001  
**Customer Name:** Mr Jack O'Neill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02922/1/001  
**Customer Name:** Mr Adrian Doe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02923/1/001

**Customer Name:** Mr Matt Perry

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02924/1/001  
**Customer Name:** Ms Annette Hart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02925/1/001  
**Customer Name:** Mr Christopher Chalkley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02926/1/001  
**Customer Name:** Mr David Larkin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02927/1/001  
**Customer Name:** Ms Vanessa Biancardi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02928/1/001  
**Customer Name:** Ms Rhoda Breakell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02929/1/001  
**Customer Name:** Mr Simon Breakell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02930/1/001  
**Customer Name:** Mr Daniel Chalkley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02931 /1/001  
**Customer Name:** Ms Marcia Chalkley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02932/1/001  
**Customer Name:** Mr Stephen Chalkley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02933/1/001  
**Customer Name:** Mr Thomas Rothen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02910/1/001  
**Customer Name:** Ms Maria Ryan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02911/1/001  
**Customer Name:** Mr Neil Tolefree

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02912/1/001  
**Customer Name:** Mr Alan Maitland Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02913/1/001  
**Customer Name:** Ms Alexandra Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02914/1/001  
**Customer Name:** Ms Helen Frances Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02166/1/001  
**Customer Name:** Ms Tanya Shah

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02915/1/001  
**Customer Name:** Ms Hilary Thornhill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02916/1/001

**Customer Name:** Mr Oliver Huntley–Robertson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02918/1/001  
**Customer Name:** Ms Camille Morgan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02919/1/001

**Customer Name:** Mr Clay Pole

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02920/1/001  
**Customer Name:** Ms Tanya Patterson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02858/1/001  
**Customer Name:** Ms Barbara Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02859/1/001  
**Customer Name:** Mr David Cumper

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02860/1/001  
**Customer Name:** Mr Pete Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02900/1/001  
**Customer Name:** Ms Pamela Miller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01345/2/001  
**Customer Name:** Ms Fiona Richards

**Summary of representation:**

If the proposal were to be approved surrounding roads would be gridlocked. There will be environmental impacts, and the main road to the M25 and St Peters Hospital would be clogged – which would be untenable. The proposal would cause many complexities.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02841/1/001  
**Customer Name:** Ms Susan Holden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02821 /2/003  
**Customer Name:** Ms Julia Wilson

**Summary of representation:**

This is green belt land that provides habitat for wildlife.

No infrastructure has been proposed and as a result existing problems will increase, including Traffic.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 01994/1/001  
**Customer Name:** Mrs Marie Craig

**Summary of representation:**

It is not clear how many dwellings are being proposed on land east of Martyr's Lane.

There is no information provided regarding any additional infrastructure to support the level of growth. The surrounding roads are already problematic and congested . Schools and GPs are oversubscribed because of too many people. Even allowing for deaths and migration, the problems will increase in ten years' time.

There is no sense in increasing the population and cars at Martyr's Lane when there are alternative areas to build communities with the necessary new roads, schools and doctors' surgeries.

Healthy sustainable communities require a balance of housing and amenities. I am not in favour of new building unless the infrastructure is improved accordingly.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The number of proposed dwelling on the Martyrs Lane site is 1200. As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as

envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 01097/2/001

**Customer Name:** Ms Kim Bent

**Summary of representation:**

Concerns about overcrowding– including traffic and roads.

Concern about the loss of outdoor spaces– including forests

**Officer Response:**

The Council's response regarding traffic and loss of forest can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

The Council has its own locally specific policy which establishes the importance of open space to the wellbeing of the community and the need for their protection and provision where needed. Policy CS17: Open space, green infrastructure, sports and recreation of the Core Strategy establishes a presumption against any development that would involve the loss of facilities except where it can be demonstrated that there is excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development.

It is important to stress that Policy CS17 requires all development to contribute towards the provision of outdoor facilities. If the land is safeguarded appropriate contribution will be sought towards enhanced outdoor facilities. The Council's Regulation 123 List makes open space and recreational facilities a priority to benefit from CIL funding. This can be planned as an integral part of the proposed development on site or contributions could be made to provide alternative facilities at a location that is accessible to users or to enhance existing facilities where maximum benefits could be achieved.

**Contributor Reference:** 02965/1/001  
**Customer Name:** Mr Douglas MacDonald

**Summary of representation:**

Concerned about 400 homes in Mayford in addition to the recent development nearby at Kingsmoor. Development would have an adverse impact on social and community facilities and traffic.

There seems to be no consideration for the impact of development on infrastructure and the lives of existing residents.

**Officer Response:**

The Council notes the representation outlining reasons against safeguarding land for future development needs in other areas of the Borough. This will be taken into account to inform the preferred approach to safeguarding.

Further details can be found in the Regulation 18 Consultations Issues and Matters Topic Paper in particular Sections 3.0 and 21.0.

**Contributor Reference:** 02966/1/001  
**Customer Name:** Mr Kevin De Cruz

**Summary of representation:**

There is a clear local demand for housing and therefore all of the sites should be safeguarded for future development needs.

**Officer Response:**

Support for all of the proposed safeguarded sites is noted.

The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation will rest on balancing a number of factors including weighing up the most sustainable site(s) when compared against the other reasonable alternatives.

**Contributor Reference:** 02770/1/001  
**Customer Name:** Mr Bob Cowell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02771/1/001  
**Customer Name:** Mr Roger Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02772/1/001  
**Customer Name:** Ms Jane Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02147/1/001

**Customer Name:** Ms Jo Ryder

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02773/1/001  
**Customer Name:** Ms Liz Drummond

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02774/1/001  
**Customer Name:** Ms Jennifer Shaw

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02775/1/001

**Customer Name:** Joe Holden

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02776/1/001  
**Customer Name:** Mr Peter Cullis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02801/1/001  
**Customer Name:** Mr John Mackowski

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02802/1/001  
**Customer Name:** Ms Samantha Herbert

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02807/1/001  
**Customer Name:** Mr Jeremy Sigger

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02809/1/001  
**Customer Name:** Ms Mary Cowell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02690/1/001  
**Customer Name:** Ms Elizabeth Pocknell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02810/1/001  
**Customer Name:** Mr Ferdinand Aragon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02811/1/001  
**Customer Name:** Ms Carolyn Stanley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02843/1/001  
**Customer Name:** Mr Brian Thomas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02845/1/001  
**Customer Name:** Mr Paul Steventon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02848/1/001  
**Customer Name:** Mr Jason Lindsay

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01271/1/001  
**Customer Name:** Cllr Beryl Hunwicks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02850/1/001  
**Customer Name:** Mr Peter Jefferis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02852/1/001  
**Customer Name:** Mr Philip Larner

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02853/1/001  
**Customer Name:** Ms Christine Graham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02854/1/001  
**Customer Name:** Mr Derek Grice

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02855/1/001  
**Customer Name:** Ms Margaret Boyde

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02856/1/001  
**Customer Name:** Ms Siobhan Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02857/1/001

**Customer Name:** Jo Holloway

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02812/1/001  
**Customer Name:** Ms Kirsten Patient

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02815/1/001  
**Customer Name:** Ms Jane Sigger

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02817/1/001  
**Customer Name:** Mr Andrew Hall

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02820/1/001  
**Customer Name:** Ms Jakki Steer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02821 /1 /001  
**Customer Name:** Ms Julia Wilson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02823/1/001  
**Customer Name:** Mr Martin Read

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02825/1/001

**Customer Name:** Ms Jane Read

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02827/1/001  
**Customer Name:** Ms Lynne McIntee

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02829/1/001  
**Customer Name:** Ms Marianne Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02830/1/001  
**Customer Name:** Mr Mario Biancardi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02832/1/001  
**Customer Name:** Ms Carol Biancardi

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02834/1/001  
**Customer Name:** Ms Sally Champion

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02836/1/001

**Customer Name:** Ms Val Napier

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02838/1/001  
**Customer Name:** Mr Howard Evans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01880/1/001  
**Customer Name:** Ms Sylvia Lindsay

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01098/2/001  
**Customer Name:** Mr Daniel Sturgeon

**Summary of representation:**

Concerned about overcrowding– including already congested roads

Concern about the loss of outdoor open space including forest.

**Officer Response:**

There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council is aware of the existing designated Ancient Woodward towards the northern end of the land. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees. This is highlighted in the Housing White Paper. This particular Ancient Woodland is designated on the Council Proposals Map for protection. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss. The nature and type of some of the surveys that will be required to accompany any development proposals are set out in Section 9 above. The surveys will make sure that those trees and other features of environmental and amenity significance are fully assessed and protected from development, where necessary.

The Council has its own locally specific policy which establishes the importance of open spaces to the wellbeing of the community and the need for their protection and provision where needed. Policy CS17: Open space, green infrastructure, sports and recreation of the Core Strategy establishes a presumption against any development that would involve the loss of facilities except where it can be demonstrated that there is excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development.

It is important to stress that Policy CS17 requires all development to contribute towards the provision of outdoor facilities. If the land is safeguarded appropriate contribution will be sought towards enhanced outdoor facilities. The Council's Regulation 123 List makes open space and recreational facilities a priority to benefit from CIL funding. This can be planned as an integral part of the proposed development on site or contributions could be made to provide alternative facilities at a location that is accessible to users or to enhance existing facilities where maximum benefits could be achieved.

**Contributor Reference:** 02716/1/001  
**Customer Name:** Mr Christopher Paul Carter

**Summary of representation:**

Supports proposal as a good alternative – queries why it wasn't considered earlier.

Previous sites raised concerns for fear of losing Green Belt – particularly around Mayford. Also due to potential pressure on local roads and infrastructure.

Can't see how Woking will cope with upwards of 1000 homes, especially taking other housing projects such as Moor Lane and Woking Football club into consideration. Where will people find employment, schools, health care, amenities, transport etc.

The proposal site has easy access to main routes such as M25, airports, and south to Woking and its station. There is already a high density of northerly traffic flow on the A320.

But concerns include sufficient preparation for such an increased number of homes; providing sufficient local employment; pressure on services; and quality of life of current residents.

**Officer Response:**

Support, with concerns, is noted.

Parcels of land north of the New Zealand Golf Course that had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. The Council therefore did in fact consider parts of the site early in the DPD preparation process, and it was due to a change of circumstances with land in ownership of McLaren that the site was reconsidered.

The Regulation 18 consultation Issues and Matters Topic Paper sets out a detailed response to the concerns regarding the originally proposed sites, particularly in Sections 3 (regarding infrastructure provision) and Sections A, C, F, and G regarding impacts on Mayford.

It also sets out how housing will be delivered without undermining the overall purpose and integrity of the Green Belt and how site allocations will be the most sustainable option (Section 1). In order to accommodate more housing, the Core Strategy also identifies the broad location for new jobs, community facilities and services and how they will be delivered; and a framework for securing the necessary infrastructure to support development, including transport, education, health, utilities, open spaces and green infrastructure.

The draft Site Allocations DPD has been informed by a number of studies, such as Transport Assessments and an Infrastructure Delivery Plan (see Section 8 of the Topic Paper for additional evidence), to ensure that the development of a site – and its future inhabitants – is supported by sufficient infrastructure.

The merits of the proposal as set out in the representation are noted and will weigh in the balance of considerations by Members.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

Section 21 of the Regulation 18 consultation Issues and Matters Topic Paper describes how the quality of life of residents will be maintained. This would equally apply to release of Green Belt land at Martyrs Lane.

**Contributor Reference:** 00353/1/001  
**Customer Name:** Mrs Amanda Downham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00225/1/001  
**Customer Name:** Ms Carey Leach

**Summary of representation:**

It would exacerbate levels of traffic – particularly on A320 and out onto the M25. It would add to an already overpopulated area (the highly developed land around Sheerwater). Local infrastructure facilities – e.g. West Byfleet Medical Centre – would not be able to support a development of this magnitude. The green areas of the Borough should be retained. Priority should be to redevelop disused/derelict sites to address housing need.

**Officer Response:**

The traffic implications of the proposal, including the impacts on the A320 and roads out onto the M25, are addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

The justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy is set out in Paragraph 1 of the 'Regulation 18 Consultation issues and matters topic Paper'. Paragraphs 1.6–1.9 explain how previously developed land was initially assessed, but that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027 because sufficient sites could not be identified in the urban area to meet the requirement over the entire plan period. Section 2.0 of the topic paper addresses the requirement to safeguard land for future development needs.

**Contributor Reference:** 02779/1/001  
**Customer Name:** Ms Patricia Cryer

**Summary of representation:**

Fewer people will experience negative impacts. The land to the east of Martyrs Lane is closer to the M25 for residents' ease of access.

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is

submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02780/1/001  
**Customer Name:** Mr Neil Search

**Summary of representation:**

Regulation 18 proposed safeguarded sites are more appropriate sites for removal from Green Belt for residential development.

The land to the east of Martyrs Lane has many issues, particularly the proximity of a busy road which is frequently closed.

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The preference towards the original proposed sites as set out in the representation are noted and will weigh in the balance of considerations by Members.

**Contributor Reference:** 02782/1/001  
**Customer Name:** Mr Keith Parker

**Summary of representation:**

Safeguarding land to the east of Martyrs Lane rather than the originally identified sites would be excellent because: developing one site against six would reduce costs; area disruption would be reduced five-fold; the infrastructure, road access etc would be better here; benefits of developing one large area, similar to the successful Goldsworth Park development, rather than six small developments which would cause major disruption.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 02783/1/001  
**Customer Name:** Mr John Douglas

**Summary of representation:**

Objects to the proposal due to limited facilities such as off-street parking, medical and public services.

**Officer Response:**

If the site were safeguarded for housing development, any planning application coming forward would be assessed at Development Management stage to ensure that satisfactory parking standards – including off-street parking – were met.

The provision of suitable infrastructure, including social infrastructure such as medical facilities, is addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 02786/1/001

**Customer Name:** M Schafer

**Summary of representation:**

The area cannot sustain increased population: the surrounding infrastructure such as station car parks, schools, utilities and poorly maintained roads are at capacity and suffer traffic problems.

**Officer Response:**

It is acknowledged that an increase in population as a result of housing development would increase pressure on infrastructure. This would be the case irrespective of whether it is a single site on land east of Martyrs Lane, or at the originally proposed sites. However, the Council would ensure that the development of any land it safeguards is supported by adequate and necessary social and physical infrastructure such as schools and roads. The traffic and infrastructure implications of the proposal are addressed in more detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, including how infrastructure is funded.

**Contributor Reference:** 02787/1/001  
**Customer Name:** Mr Laurence Rogers

**Summary of representation:**

The advantages of developing land to the east of Martyrs Lane, rather than the Mayford/Hook Heath sites, include: a larger site which could accommodate 1,200 houses, including affordable housing, as well as necessary infrastructure, without encroaching on the golf course; economies of scale associated with one larger site make it easier to create associated infrastructure and simplify the process for obtaining planning permission; proximity of major employers; opportunity to provide a new neighbourhood centre as part of the development, providing employment opportunities; better surrounding transport infrastructure with easier access to the M25, Heathrow Airport and to Woking Town Centre; good existing cycle and bus routes; easier road widening of the A320 if necessary due to little development long this road. The road network at the Mayford/Hook Heath sites can't take more traffic, and local infrastructure here is over-stretched. The A320 to the south of Woking is overburdened with traffic.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to

consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply equally to development at both Martyrs Lane and the six other sites.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure. It is important to note that the Council has carried out a Green Belt boundary review that assessed the sustainability of the six previously proposed sites. The outcome of the study demonstrated that the six sites are also in sustainable locations, and in reasonable proximity to existing local services and community facilities.

The Council has the resources and expertise to determine planning applications for single or multiple sites, and development of a single site would not necessarily simplify the process for obtaining planning permission.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. The Regulation 18 Consultation Issues and Matters Topic Paper sets out a detailed response to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

**Contributor Reference:** 02788/1/001  
**Customer Name:** Ms Harriet Geis

**Summary of representation:**

There is not enough infrastructure, such as schools and roads, to support a development of this scale. The limited road infrastructure would exacerbate traffic on already heavily trafficked roads. Development would cause flooding due to lack of drainage.

**Officer Response:**

Traffic and infrastructure implications of the proposal are addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper, taking into account the scale of development. Flooding implications are also addressed in detail in the Paper.

**Contributor Reference:** 02796/1/001  
**Customer Name:** Ms Fiona Stafford

**Summary of representation:**

The land east of Martyrs Lane is big enough to accommodate 1200 houses, including affordable housing and necessary infrastructure, without encroaching on the golf course. One single large housing estate makes it easier to create that infrastructure, rather than overloading existing over-stretched facilities. The planning permission process would be simplified. There are three major employers nearby, and a new neighbourhood centre on the site could provide additional employment opportunities. The A320 provides good access to the M25, M3 and M4, and Woking Town Centre, as well as the Woking mainline station and West Byfleet station. There are existing bus and cycle routes, including to Woking Town Centre. There is little development along the A320 north of Woking, making any necessary road widening easier. The A320 south of Woking experiences too much traffic already. Although in the Green Belt, the site has no national or local landscape designations unlike the originally proposed safeguarded sites. North of the golf course the land is largely disused and derelict, and planning permission has previously been granted so there is a presumption that the land is suitable for development. The size of the site allows at least 1200 dwellings, or more if needed, to be delivered. A decision to safeguard this area now will mean that it can be taken into account in the redevelopment of Sheerwater.

**Officer Response:**

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. New Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply equally to development at both Martyrs Lane and the six other sites.

The Council will make sure that the development of any land it safeguards is supported by adequate and necessary social, physical and green infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications.

The Council has the resources and expertise to determine planning applications for single or multiple sites, and development of a single site would not necessarily simplify the process for obtaining planning permission.

The Council has carried out a series of studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs. The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the same traffic hotspots. The Regulation 18 Issues and Matters Topic Paper sets out a detailed response (under paragraph 3) to traffic concerns relating to the original proposed safeguarded sites. The transport studies confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

Although northern parts of the site have been granted planning permission in the past, this decision was made in an entirely different context and does not necessarily imply that the land is suitable for housing development. Parcels of land north of the golf course were assessed as part of the Site Allocations DPD process, and ruled out as their development would lead to isolated development in the Green Belt (see paragraph 3.5.11 of Peter Brett's Green Belt Boundary Review report). It is accepted that the Martyrs Lane site does not contain landscape constraints such as those designated under policy CS24 of the Core Strategy (i.e. 'escarpment and rising ground of landscape importance'), but it does in fact contain other development

constraints, such as areas of Ancient Woodland. Development coming forward at any of the proposed sites would be expected to take these constraints into account in any planning application.

**Contributor Reference:** 02818/1/001  
**Customer Name:** Ms Julie Drake

**Summary of representation:**

The originally proposed safeguarded sites in Pyrford and Byfleet suffer from congested roads, and their infrastructure and local facilities are at capacity: these areas cannot cope with additional housing and the significant increase in cars. The Martyrs Lane site benefits from more direct access to main roads such as the A320 and M25.

**Officer Response:**

The merits of land east of Martyrs Lane in terms of ease of access to main roads are noted and will weigh in the balance of considerations by Members. The implications of developing the Regulation 18 safeguarded sites on local traffic and infrastructure are addressed in the Regulation 18 Issues and Matters Topic Paper (see Section 3). For example, the Green Belt Boundary Review Sensitivity Test – Strategic Transport Assessment (2015) (TA) assesses transport implications of the originally proposed allocated sites. The TA acknowledges that there will be a net but marginal increase in traffic over and above the existing situation, which could be mitigated to enable the delivery of the proposed allocated sites. The mitigation measures would comprise both strategic schemes to be funded by developer contributions and other sources of funding and by site specific measures to be determined as part of a detailed Transport Assessment supporting planning applications.

**Contributor Reference:** 02819/1/001  
**Customer Name:** Mr John Cooke

**Summary of representation:**

An acceptable site for development as it is more remote and will have little impact on existing homes. Main concern is increase in traffic on the A320, particularly at McLaren's roundabout. The cycle lane needs improving to reduce risk of traffic jams caused by cyclists on the road.

**Officer Response:**

Support for the site is noted. The Council has carried out a series of transport studies to quantify and forecast vehicular trips that would be generated by various development options. The collective outcomes of these studies have provided a good understanding of the highway impacts, including those on the A320 and the McLaren's roundabout. The studies conclude that traffic at existing hotspots – including the A320 Chertsey Road / Guildford Road – will be exacerbated. If the Martyrs Lane site were considered for safeguarding, it would require necessary and appropriate mitigation measures to address forecast traffic impacts, and ensure the sustainable development of the site. The studies recommend a series of both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. It is possible that one of these mitigation measures could include improved cycling infrastructure to ease traffic.

In addition, each of the allocated sites will be required to undertake detailed transport assessments to determine site specific mitigation measures that would be necessary to bring forward any development. The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination.

**Contributor Reference:** 02822/1/001

**Customer Name:** Mr And Mrs Leo And Monica Iles

**Summary of representation:**

Strongly object to inappropriately planned development taking place on the following originally proposed 'Regulation 18' sites:

Ten Acre Farm (there is no justification for further expansion of the site, and development would increase risk to wildlife);

Nursery land adjacent to Egley Road (the infrastructure of Mayford cannot support the changes here);

Woking Garden Centre, Egley Road (inadequate footfall to become a viable shopping centre, and would add to traffic here);

Land adjacent to Hook Hill Lane, Hook Heath; Land to the north east of Saunders Lane; Land to the north west of Saunders Lane. Successive Planning Inspectors have refused housing applications on these rural parcels of Green Belt land.

Brownfield sites that have been formally added to the draft Site Allocations DPD in October 2016, such as land to the east of Martyrs Lane (SG1) could absorb the housing that could be built on these land parcels above many times over. With ten years to plan for them and a further thirteen years within which to build them. You have no case for the inclusion of any of the listed sites above in Mayford for this development.

**Officer Response:**

The Council has conducted a Strategic Housing Land Availability Assessment (SHLAA) to assess the capacity of the urban area (including brownfield land) to accommodate the area's housing requirement. The outcome of the SHLAA indicated a shortfall in the capacity of the urban area to meet the requirement over the plan period. The justification for release of Green Belt land for future development is addressed in detail under Section 1 of the Regulation 18 consultation Issues and Matters Topic Paper. The Topic Paper also explains under Section 4 why Green Belt land has been allocated to meet the needs of Travellers. Paragraph 4.8 in particular sets out why Ten Acres was identified and why it is considered suitable for additional pitches. Section 3 of the Topic Paper describes how adequate infrastructure provision will be made to support the Site Allocations DPD, and how Transport Assessments have informed the allocation decision-making process. The County Council as the Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

The merits of allocating land to the east of Martyrs Lane as set out in the representation are noted, and will weigh in the balance of considerations by Members.

**Contributor Reference:** 00224/1/001  
**Customer Name:** Mrs Tracy Pickering

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00226/1/001

**Customer Name:** A Collis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02814/1/001  
**Customer Name:** Mr David Moss

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02816/1/001  
**Customer Name:** Mr Joseph Genco

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02824/1/001

**Customer Name:** Ms Georgia Ayres

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02826/1/001  
**Customer Name:** Ms Rosalind Ayres

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02828/1/001  
**Customer Name:** Mr Brian Michael Stokes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02831/1/001  
**Customer Name:** Ms Sharon Zammit

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02833/1/001

**Customer Name:** Mr Roger Zammit

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02835/1/001  
**Customer Name:** Mr Steven Whittington

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02837/1/001  
**Customer Name:** Mr Stewart Graham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02839/1/001  
**Customer Name:** Mr Darren Shaw

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02840/1/001  
**Customer Name:** Ms Jenny Fowler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02842/1/001  
**Customer Name:** Mr Ronald Fowler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02844/1/001

**Customer Name:** Ms Sian James

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02846/1/001  
**Customer Name:** Mr Alan Stephenson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02847/1/001  
**Customer Name:** Mr Andrew Webb

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02849/1/001

**Customer Name:** A M Moul

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02851/1/001  
**Customer Name:** Ms Debbie Bentley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02792/1/001

**Customer Name:** M A Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00344/1/001

**Customer Name:** Ms Rona Tyler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02793/1/001  
**Customer Name:** Mrs Rosalind Cross

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02794/1/001  
**Customer Name:** Ms Audrey Micallef

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02795/1/001  
**Customer Name:** Ms Jean Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02797/1/001

**Customer Name:** Ms Sue Walsh

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02798/1/001  
**Customer Name:** Ms Karen O'Neill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02799/1/001  
**Customer Name:** Ms Clare Butters

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02800/1/001

**Customer Name:** Mr And Mrs Martin And Jill Pope

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02803/1/001

**Customer Name:** Mr John Hart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02804/1/001  
**Customer Name:** Ms Margaret Hart

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02805/1/001  
**Customer Name:** Ms Jenny Hoff

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02806/1/001  
**Customer Name:** Mrs Brenda Stone

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02808/1/001  
**Customer Name:** Mr Martin Stone

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02813/1/001  
**Customer Name:** Mr Roland Anderson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02791 /1 /001  
**Customer Name:** Mr Charles Tyler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02777/1/001  
**Customer Name:** Ms Carrie Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02778/1/001  
**Customer Name:** Ms Sarah Bulman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02781/1/001  
**Customer Name:** Ms Christine Dixon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02784/1/001  
**Customer Name:** Mrs Plumbridge

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02785/1/001  
**Customer Name:** Ms Jacky Brewer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02789/1/001  
**Customer Name:** Mr Jack Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02790/1/001

**Customer Name:** Ms Rosemary Banks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00109/3/001

**Customer Name:** Mr And Mrs Martin And Shirley Bartley

**Summary of representation:**

Objects to the proposal because:

1. The whole of the site falls within the green belt. When the Council granted planning permission to McLaren to build a technology centre on their existing site in 2015 it was agreed that Plan/2011/0823 would be revoked.
2. The site is adjacent to Horsell Common which is a SSSI and has protection status (SPA) this includes a development protection zone. Much of the proposed land falls within in the protection zone.
3. Much on the land, to the north along the River Bourne, which is not part of the golf course, falls within zones 2–3 of the Environment Agency Flood Planning map, thus increasing flooding.
4. The access to the site would be via the A320 which suffers from considerable congestion and more development would cause grid lock
5. Lack of infrastructure e.g. hospitals, schools, surgery etc. which are at capacity
6. Fair Oaks development impact

**Officer Response:**

Objection is noted.

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses the issues raised in detail, including:

- Likely impact on the integrity of the Green Belt;
- Planning history regarding the revoked planning permission for McLaren land;
- Assessment of flood risk and avoidance of Flood Zones 2–3;
- Transport impacts, including on A320 and how mitigation measures would be required;
- Infrastructure provision to support development.
- Fair Oaks impact

It is acknowledged that the Martyrs Lane site is in close proximity to Horsell Common. The Core Strategy and Development Management DPD contain robust policies to make sure that important wildlife sites and landscape features are protected, including those surrounding development sites. In particular, policy CS7 on Biodiversity and nature conservation restricts development adjacent to designated sites where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated. Policy CS8 also seeks to make sure that harm to the SPA and SAC is avoided as a result of development. As part of the consultation, the Council has consulted with the relevant environmental and biodiversity organisations including Natural England, Surrey Wildlife Trust and Horsell Common Preservation Society. Their comments will be addressed separately and taken into account in making a final decision on the Council's safeguarding strategy.

**Contributor Reference:** 02717/1/001

**Customer Name:** G E Sheat

**Summary of representation:**

The outlined development at Martyrs Lane is considered on balance preferable to the other 6 sites.

The site is more coherent, self contained and providing the much needed housing subject to the following provisos:

The smaller sites are not nibbled at except perhaps the smallest

Enhanced, sufficient improvements to access roads, especially A320 leading to M25. Also eventually the M3 junction with Chobham bypass.

The site has full amenities including bus routes, trains, shopping, access to Sheerwater and West Byfleet, otherwise it would generate traffic

Proximity to large employers like McLaren, could live on site

Overall an attractive layout with amenity land with an appropriate housing mix

**Officer Response:**

Support for the land to the east of Martyrs Lane is noted.

As part of the consultation exercise McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. Without the Council using its Compulsory Purchase Powers to acquire land, it would be unrealistic to assume that the residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

The Council will only safeguard the land east of Martyrs Lane to meet future development needs only if it felt that it will be the most sustainable land to develop when compared against the other reasonable alternatives. The main essence of this consultation exercise is to gather further necessary information to help Members make that decision. A judgment about the relative merits of the sites with respect to how they contribute to sustainable development will be made in the report to Members when all the other representations are analysed.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

The merits of the land east of Martyrs Lane as set out in the representation are noted and will weigh in the balance of considerations by Members. It is acknowledged that there are major employers in close proximity to the Martyrs Lane site that could benefit from Affordable Housing provision on the site. It is also the case that each of the other six sites have their own locational benefits that the Council would take into account.

Nevertheless policy CS1 of the Core Strategy sets out the overall spatial strategy that seeks to manage development at key locations that are in close proximity to services, facilities and jobs. This will be a key factor in informing the Council's preferred approach for the Site Allocations DPD. The six other sites as demonstrated in the Officer's Response to the Regulation 18 consultation also meets the Policy CS1 tests to some degree.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full

and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

Public transport services and infrastructure currently serving the vicinity of the Martyrs Lane and the other six sites are relatively limited. The land east of Martyrs Lane is indirectly served by public buses. Five buses operate in the general area. The 446 and 593 buses travel along the A320 Chertsey Road/Guildford Road and the 462, 556 and 592 buses travel along the A245 Woodham Lane. The 446 is a relatively reasonable hourly service and connects to Woking Town centre. The 592 only runs 3 days per week and three times on those days. The 593 operates 3 services per week whilst the 462 and 556 operate Monday to Friday once per day. The buses do not provide usable routes to access services and facilities at West Byfleet. Whilst this might be better than services serving some of the other six sites, it would be reasonable to say that current services are relatively limited. As recommended by the Transport Assessments, it would be necessary for the Council to work with providers to improve service provision and frequency whether the six sites or Martyrs Lane is developed.

The County Council has carried out for the Council an assessment of how accessible rail stations are by public transport from the various sites being considered for safeguarding. By this measure alone, it appears that the Martyrs Lane site, in particular its northern part will be relatively the least sustainable option when compared with the other six sites. Details of the modelling are background information which can be found on the website.

Whilst the southern part of the Martyrs Lane site is within reasonable cycling distance of West Byfleet Station, there are no clear advantages between the northern part of the site and the other proposed safeguarded sites.

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Council will make it an essential requirement for the site to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment and tree survey to determine the levels of valuable landscape features on the site. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to in regards to design and housing mix. Particular reference is made to Policies CS10: Housing provision and distribution, CS11: Housing mix, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

**Contributor Reference:** 00223/1/001  
**Customer Name:** Mr Peter Green

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00188/2/001  
**Customer Name:** Mr Jamie Sharpley

**Summary of representation:**

Does not agree with creating a new area of development. Prefers Regulation 18 proposal.

**Officer Response:**

Preference for Regulation 18 proposals noted.

**Contributor Reference:** 00195/1/001  
**Customer Name:** Mr Michael Smith

**Summary of representation:**

Does not support the proposal. Land to the east of Martyrs Lane is less appropriate than previously identified sites. Surrounding roads are at saturation point for traffic. Part of the site has a high water table. A large part of the site is for recreational use (the golf course). All of the site is within the Green Belt. Site is remote from infrastructure provision. No planning history for residential use; and economic use of northern part of site granted under 'Very Special Circumstances'.

The Regulation 18 proposed sites would benefit from local infrastructure provision. Traffic will be reduced by dispersed nature of sites. All would result in expansion of existing urban environment. Sites were proposed on basis of a Borough-wide Green Belt Boundary Review.

The introduction of the site to the east of Martyrs' Lane at this late juncture can achieve nothing other than disruption and confusion.

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion along the A320 corridor between Woking town centre and the M25.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Martyrs Lane site is not used for agricultural purposes, this can also be said for the majority of the six original sites identified for safeguarding in the draft Site Allocations DPD. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed safeguarded sites are classified as high quality agricultural land by DEFRA. There is therefore no clear advantage between the Martyrs Lane site and the original six sites on this matter.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% (Excluding Martyrs Lane Site) of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based on the individual merits of the particular proposal.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed. The conditions attached to the latest planning approval at the McLaren site west of the A320 (PLAN/2014/1297) presented a change in circumstance to justify the Martyrs Lane consultation. Representations received during the consultation will provide useful information to inform Members on their preferred approach to safeguarding.

**Contributor Reference:** 00196/1/001  
**Customer Name:** Ms Sonia Appleby

**Summary of representation:**

Objects to consideration of Green Belt land for housing development. Development at land to the east of Martyrs Lane will exacerbate levels of traffic and air pollution for existing residents. Lack of infrastructure provision to support new and existing housing development.

**Officer Response:**

Justification for releasing Green Belt land for development to meet future housing need is set out in Section 1 of the Regulation 18 Consultation Issues and Matters Topic Paper.

The traffic and infrastructure implications of the proposal are addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

**Contributor Reference:** 00205/1/001  
**Customer Name:** Mr Ronald Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00206/1/001  
**Customer Name:** Mr Andrew Mellett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00207/1/001  
**Customer Name:** Ilona Otrebska

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00208/1/001  
**Customer Name:** Mr John Benbow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00209/1/001  
**Customer Name:** Mr Robin Hoyle

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00210/1/001  
**Customer Name:** Ms Vikki Walls

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00211/1/001  
**Customer Name:** Mr Ray Benbow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00212/1/001  
**Customer Name:** Ms Sue Benbow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00186/1/001  
**Customer Name:** Mr Nigel Perryman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00187/1/001  
**Customer Name:** Ms Katie Blackham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00189/1/001  
**Customer Name:** Mr James Belso

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00190/1/001  
**Customer Name:** Mr Andy Grout

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00191/1/001  
**Customer Name:** Mr Stephen Newman

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00192/1/001  
**Customer Name:** Ms Paula Belso

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00193/1/001

**Customer Name:** Ansa Nisa

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00194/1/001  
**Customer Name:** Mr Brett Benson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00197/1/001  
**Customer Name:** Ms Marianne Meinke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00198/1/001  
**Customer Name:** Mr David Coupe

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00199/1/001  
**Customer Name:** Ms Briony Sloan

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00200/1/001  
**Customer Name:** Ms Brigid Stubbs

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00201/1/001  
**Customer Name:** Frances Wood

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00202/1/001  
**Customer Name:** Mr Paul Haygreen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00203/1/001  
**Customer Name:** Mr Benedict Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00204/1/001  
**Customer Name:** Mrs Catherine Watt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00213/1/001  
**Customer Name:** Mr Dudley Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00214/1/001

**Customer Name:** Mr John Mills

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00215/1/001  
**Customer Name:** Mr Ronald Woollcott

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00216/1/001  
**Customer Name:** Mr Andrew Choules

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00217/1/001

**Customer Name:** Ms Jo Kelly

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00218/1/001  
**Customer Name:** Ms Marisa Baker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00219/1/001  
**Customer Name:** Mr Richard Mallett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00220/1/001

**Customer Name:** Ms Nicole Thomson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00221/1/001  
**Customer Name:** Mr Michael Jones

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00222/1/001

**Customer Name:** Lesley Green

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 01053/2/001  
**Customer Name:** Ms Geraldine O'Farrell-Wallum

**Summary of representation:**

Objects to the proposal

Without road improvements and public transport, the proposal will create more traffic and public facility problems

Impact of congestion on the A320 and M25

Need to retain green spaces, should use brownfield sites, offices are empty and affordable homes in the town centre

Woking is becoming an ugly place to live losing all its green areas. The comments from the Chief Executive to suggest we move will be taken up.

Lack of infrastructure

**Officer Response:**

The Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper addresses these issues raised in detail, including:

- Transport impacts, including on A320 and M25, and how mitigation measures would be required;
- Infrastructure provision to support development.
- Public transport

It is not correct that the Council have not comprehensively assessed brownfield sites as part of the evidence to inform the Site Allocations DPD. The Council has published detailed information on previously developed land (brownfield land) that is suitable, available and achievable for housing and employment purposes. This is contained in the Strategic Housing Land Availability Assessment (SHLAA) (2015), the Employment Land Review (2009) and Employment Topic Paper (2015). The documents are on the Council's website at [www.woking.gov.uk](http://www.woking.gov.uk). The Council has also carried out and published a Sustainability Appraisal Report that assesses all reasonable alternative brownfield sites in a consistent manner against a set of sustainability objectives, including environmental, social and economic objectives. The available evidence on previously developed land is sufficiently comprehensive and robust enough to enable informed decisions about the preferred sites being proposed for allocation in the DPD. The evidence also demonstrates that the preferred sites are the most sustainable when compared against other alternative sites. It is important to highlight that there is no presumption that land which is previously developed is necessarily suitable for residential development. Officers will consider any other sites that will be suggested for consideration in response to the Regulations 18 and 19 consultations on the DPD.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at Martyrs Lane and the six other sites. Residential development at any of the safeguarded options should be able to meet the Affordable Housing requirements in full and still achieve positive viability. In this particular regard, there are no perceived relative advantages over each other.

The Council has to make sure that any land removed from the Green Belt will not undermine its overall purpose and integrity. Whilst some Green Belt land offers benefits to local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet future development needs is about 3.5% of the borough's total Green Belt area and therefore the amount proposed to be released is relatively modest. The overall purpose of this consultation is to inform the Council's decision on ensuring that the most sustainable sites are identified for its preferred approach to safeguarding.

Regarding the representation to leave the local area, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 00176/1/001  
**Customer Name:** Mr Timothy Howe

**Summary of representation:**

This is a better option compared to the other sites.

**Officer Response:**

Support noted

**Contributor Reference:** 00169/1/001  
**Customer Name:** Mr Anthony Brewer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00185/1/001  
**Customer Name:** Ms Amanda Morrison

**Summary of representation:**

The Martyrs Lane site should not be substituted for the other site. The original consultation objection responses regarding the Pyrford site proposal were adequately discharged by the Planners' commentary to each objection.

The impact of surrounding sites such as the Surrey Heath Garden Village development and building on both Martyrs Lane and Fair Oaks will result in unacceptable pressure on all roads leading into/out of Woking. The potential to build East of Martyr's Lane will do this alone without the added impact of Fair Oaks. The local infrastructure cannot support such a large-scale development.

This particular site allocation is not part of the Woking Development Plan that has already forecast the needs of the Borough and the necessary sites to achieve this. The loss of the Green Belt, ancient woodland and endangering wildlife which are all important to Woking and maintaining development within a controlled boundary.

**Officer Response:**

In terms of infrastructure, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council has adopted the community infrastructure levy (CIL) as the primary means for securing developer contributions towards strategic infrastructure provision. The levy is set at a rate that will not undermine development viability. A viability assessment has been carried out to demonstrate that residential development across the borough will achieve positive viability. Officers accept that the CIL Charging Schedule will continue to be reviewed in future to take into account new information. Nevertheless, it is not envisaged that the levy will be set at a level that will undermine development viability.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites. However, it has always been very clear to the Council that infrastructure funding has never been and cannot be met entirely by developer contributions. Public sector contributions have and will always be a significant part of infrastructure funding, and the Council works tirelessly with relevant agencies to secure public sector and other sources of funding for infrastructure projects. For example, the CIL Charging Schedule identifies the priority infrastructure to support the delivery of the Core Strategy, how much it will cost, how much of the funding will met from developer contributions and how much is expected to be secured from public sector sources. This gives an indication of the scale of public sector funding expected to help deliver the identified infrastructure.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport provider for this area to quantify the transport and education provision needed to support the development and how they could be delivered. All other relevant infrastructure and utility providers are also consulted to help assess the infrastructure needs to support future growth. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the

implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of the loss of the Green Belt, the Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes.

The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen in this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

In terms of the ancient woodlands and wildlife, the Council is aware of the existing designated Ancient Woodland towards the northern end of the land. Should the site be safeguarded for future development needs it is not intended that this part of the land would be developed. The Council is also aware of the Government's commitment to protect Ancient Woodland and veteran trees. This is highlighted in the Housing White Paper. This particular Ancient Woodland is designated on the Council Proposals Map for protection. Policy CS7: Biodiversity and nature conservation of the Core Strategy seeks to protect Ancient Woodlands from any development that will be anticipated to have potentially harmful effects or lead to its loss. The nature and type of some of the surveys that will be required to accompany any development proposals are set out in Section 9 above. The surveys will make sure that those trees and other features of environmental and amenity significance are fully assessed and protected from development, where necessary.

The land is not covered by any absolute environmental constraints. The constraints on the site can be fully assessed and appropriate mitigation put in place to address any potential adverse impacts. The land is not a designated Special Protection Area, Special Area of Conservation, Sites of Special Scientific Interest or common land. The site would have been designated as SPA by Natural England if any presence of Dartford Warbler and Nightjar were significant enough to justify designation.

The land could be wildlife rich, and the Council will make it an essential requirement for it to be fully assessed by requesting any development proposal to be accompanied by a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site and for the design of any proposal to have regard to biodiversity opportunities on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas. The Council will also require that the design of any development builds in wildlife features and corridors to enhance biodiversity where feasible. These requirements would apply to any of the Green Belt sites that the Council decides to safeguard.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

The Council accepts that it has not carried out a detailed ecological assessment of the site, and recognises the importance for doing so. However, the appropriate time to undertake such a

study would be at the development management stage. The land will only be released for development as part of the review of the Core Strategy and or the Site Allocations DPD, and that will be the most appropriate time to set out the key requirements for any development to be acceptable.

Environmental organisations such as Natural England, Environment Agency and Surrey Wildlife Trust have all been consulted and their representations will be taken into account to inform decisions about the preferred approach to safeguarding and how the potential ecological integrity of the land can be protected.

**Contributor Reference:** 00170/1/001  
**Customer Name:** Mr Kevin Dent

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00171/1/001  
**Customer Name:** Ms Nikki McNeill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00172/1/001  
**Customer Name:** Ms Jeanne Ashdown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00173/1/001  
**Customer Name:** Mr Les Adcock

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00174/1/001

**Customer Name:** Mrs D Boodia

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00175/1/001  
**Customer Name:** Mr Philip Young

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00177/1/001  
**Customer Name:** Mr Tim Stolworthy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00178/1/001

**Customer Name:** Emma

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00179/1/001  
**Customer Name:** Ms Haley Tortorici

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00180/1/001

**Customer Name:** N Angus

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00182/1/001  
**Customer Name:** Ms Lisa Mitchell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00183/1/001  
**Customer Name:** Dr Sohail Amer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00184/1/001  
**Customer Name:** Mr Christopher Ashdown

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00162/1/001  
**Customer Name:** Ms Justine Butler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00163/1/001  
**Customer Name:** Mr Martin Willis

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00164/1/001  
**Customer Name:** Mr Stuart Telfer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00165/1/001  
**Customer Name:** Ms Ioanna Namintraporn

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00166/1/001  
**Customer Name:** Mr Graeme Laing

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00167/1/001  
**Customer Name:** Mr Eddy Holding

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00168/1/001  
**Customer Name:** Ms Larissa Zaporajtchenko

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00181/1/001  
**Customer Name:** Mr Ian McVeigh

**Summary of representation:**

It is better to have all the new development, supporting services, infrastructure contained and rolled out within one area rather than a number of smaller sites across the borough.

**Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

**Contributor Reference:** 00158/3/001  
**Customer Name:** Mr Jonathan Cottam

**Summary of representation:**

The new McLaren New town proposal is a disgrace. The council should be protecting the area not harming it.

**Officer Response:**

The justification for the release of Green Belt land for the development has been fully addressed as part of the Officers response to the Regulation 18 Consultations of the Site Allocation DPD, as set out in the 'Regulation 18 Key issues and matters Paper.

**Contributor Reference:** 00161/1/001

**Customer Name:** Mr Peter Bach

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00135/1/001  
**Customer Name:** Mr Clive Lowe

**Summary of representation:**

Byfleet, Mayford and Pyrford should be saved from further development as they are already very heavily populated.

The Martyrs Lane site is sparsely populated in comparison and could easily accept many more new homes, people and traffic which would have less impact on the existing infrastructure.

**Officer Response:**

Support is noted. In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council has the resources and expertise to determine planning applications. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of roads and traffic, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of

congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00137/1/001  
**Customer Name:** Ms Charlotte Davis

**Summary of representation:**

The development would place a huge strain on public services on an already overloaded resource such as schools, hospitals and local infrastructure. Traffic and congestions on roads will increase.

**Officer Response:**

In terms of infrastructure, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. It will also identify the necessary resources to determine any planning application that would be submitted whether it is a single application or multiple applications. The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

In terms of traffic, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various development options to enable the delivery of the Core Strategy and future development needs:

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The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct

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**Contributor Reference:** 00139/1/001  
**Customer Name:** Ms Stacey Hesketh

**Summary of representation:**

The area cannot cope with the additional housing, the local traffic is already congested and flooding around the area would increase with the additional houses.

**Officer Response:**

In terms of infrastructure, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

In terms of local traffic, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is

would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

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- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of flooding, Policy CS9: Flooding and water management of the Core Strategy expects development to be directed to Flood Zone 1 where there is minimum risk of flooding. The land

east of Martyrs Lane has a total area of about 112.14 ha. 102.6 ha (91.53%) of this is in Flood Zone 1, 3.16 ha (2.82%) is in Flood Zone 2 and 6.34 ha (5.65%) is in Flood Zone 3. It is always the intention of the Council that if the land is to be safeguarded, development will be concentrated on the part of the land that is in Flood Zone 1 and the consultation document makes this point very clear in paragraph 2.5. By releasing Green Belt land for future development, the Council also has to make sure that there is a strong defensible Green Belt boundary. The areas of the land covered by Flood Zones 2 and 3 are included within the safeguarded designation to make sure that there is a strong defensible Green Belt boundary. Given the location and size of the land, a detailed flood risk assessment will be a requirement of any development proposal on the site that would come forward for determination. This is a key policy requirement that will have to be met for the development to comply with both the policies of the NPPF and the Core Strategy. Policy CS9 of the Core Strategy also allows circumstantial evidence to be taken into account on a case by case basis and for sustainable drainage systems to be incorporated into development such as this. Based on the above, it is not envisaged that the occupants of the development on the site would face unacceptable risk of flooding. Insurance of properties that could be developed on the site would not be adversely affected and the development of the site would not exacerbate flood risk elsewhere.

**Contributor Reference:** 00145/1/001  
**Customer Name:** Mr Stephen Hart

**Summary of representation:**

There is insufficient resources and infrastructure to support more housing. The area is already congested. The local welfare system is already under resourced and overstretched and cannot cope with additional housing and increase in population. Green Belt needs to be maintained and protected.

**Officer Response:**

In terms of infrastructure, local welfare system and resources to support more housing, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council has adopted the community infrastructure levy (CIL) as the primary means for securing developer contributions towards strategic infrastructure provision. The levy is set at a rate that will not undermine development viability. A viability assessment has been carried out to demonstrate that residential development across the borough will achieve positive viability. Officers accept that the CIL Charging Schedule will continue to be reviewed in future to take into account new information. Nevertheless, it is not envisaged that the levy will be set at a level that will undermine development viability.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

In terms of local congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various

development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
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The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of protection and maintenance of the Green Belt, the Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes. The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs. In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 00146/1/001

**Customer Name:** Ms Emily Hart

**Summary of representation:**

Insufficient resources and infrastructure to support more housing. The area is already congested. The local welfare system is already under resourced and overstretched and cannot cope with additional housing and increase in population. Green Belt needs to be maintained and protected.

**Officer Response:**

In terms of infrastructure, local welfare system and resources to support more housing, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council has adopted the community infrastructure levy (CIL) as the primary means for securing developer contributions towards strategic infrastructure provision. The levy is set at a rate that will not undermine development viability. A viability assessment has been carried out to demonstrate that residential development across the borough will achieve positive viability. Officers accept that the CIL Charging Schedule will continue to be reviewed in future to take into account new information. Nevertheless, it is not envisaged that the levy will be set at a level that will undermine development viability.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

In terms of local congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various

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The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

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It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred

site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 00148/1/001  
**Customer Name:** Ms Jessica Hart

**Summary of representation:**

Insufficient resources and infrastructure to support more housing. The area is already congested. The local welfare system is already under resourced and overstretched and cannot cope with additional housing and increase in population. Green Belt needs to be maintained and protected.

**Officer Response:**

In terms of infrastructure, local welfare system and resources to support more housing, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council has adopted the community infrastructure levy (CIL) as the primary means for securing developer contributions towards strategic infrastructure provision. The levy is set at a rate that will not undermine development viability. A viability assessment has been carried out to demonstrate that residential development across the borough will achieve positive viability. Officers accept that the CIL Charging Schedule will continue to be reviewed in future to take into account new information. Nevertheless, it is not envisaged that the levy will be set at a level that will undermine development viability.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

In terms of local congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generate by various

development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of protection and maintenance of the Green Belt, the Core Strategy sets out the development plan policy context for identifying land within the Green Belt to meet future development requirements of the borough. The Core Strategy identifies the Green Belt as a potential future direction of growth to meet housing needs, in particular, the need for family homes between 2022 and 2027. The NPPF also encourages the safeguarding of land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period. This is necessary to ensure the enduring permanence of the Green Belt boundary. To release land from the Green Belt for development, the Core Strategy requires the Council to make sure that this will not undermine its overall purpose and integrity. The purposes of the Green Belt are defined by paragraph 80 of the NPPF and Policy CS6: Green Belt of the Core Strategy. These purposes amongst others include:

- o To check the unrestricted sprawl of large build up areas;
- o To prevent neighbouring towns merging into one another; and
- o To assist in safeguarding the countryside from encroachment.

There is a degree of relationship between these three purposes. The Core Strategy prescribes the Green Belt boundary review as the means for making sure that the purposes of the Green Belt are not undermined when identifying specific deliverable sites to meet future development needs.

In accordance with this policy background, the Council has carried out two relevant studies:

- o Woking Green Belt review (2013) by Peter Brett Associates; and
- o Landscape assessment and Green Belt review (2016) by Hankinson Duckett.

It is important to emphasise that the overall purpose of the planning system as set out in the NPPF is to contribute to the achievement of sustainable development, and the Council's ultimate decisions must be seen this overall context. Each policy in the NPPF, including the Green Belt policies is servant to the overall goal of achieving sustainable development. Regarding the spatial distribution of future development across the borough, meeting this goal would include in addition to the purposes of the Green Belt, the consideration of other factors and evidence studies such as the sustainability appraisal, proximity of sites to services and facilities, potential to encourage sustainable modes of travel and minimise adverse impacts on climate change, land availability and deliverability and the realistic prospect for mitigating development impacts, amongst other things. The decision by the Council about its preferred site(s) for the purposes of the Regulation 19 consultation should rest on balancing all these factors.

The decision to consult on the possibility of substituting the Land east of Martyrs Lane for the six safeguarded sites was appropriate and reasonable. It is important that Members of the Council are sufficiently informed before they make decisions about the version of the Site Allocations DPD that they wish to submit to the Secretary of State for Examination. In this regard, Members need to be satisfied that all reasonable options have been assessed.

**Contributor Reference:** 00151/1/001  
**Customer Name:** Mr Stephen Twilley

**Summary of representation:**

The land east of Martyrs Lane is much more suitable. The need to upgrade the road transport infrastructure and provide adequate additional infrastructure (e.g., education, health) will still have to be addressed. This site should have been considered before looking at Pyrford and Byfleet.

**Officer Response:**

Support for the site is noted and the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable.

Parts of the Martyrs Lane site had previously been promoted through the Strategic Housing Land Availability Assessment (SHLAA) and were all comprehensively assessed as part of the Sustainability Appraisal of the draft Site Allocations DPD. The SA is on the Council's website. The sites that were specifically assessed are:

- o Woodham Court (SHLAAHEW006);
- o Land to the east of Martyrs Lane (waste safeguarded site) (SHLAAHEW027); and
- o Land adjacent to 462 Woodham Lane (SHLAAHEW016).

They were all ruled out in part because their development would lead to isolated development in the Green Belt. The Council's latest evidence carried out by Hankinson Duckett, which also looked at the northern part of the land came to a similar conclusion. The study concluded that the part of the land north of the Golf Course even with the proposed McLaren extension revoked would be too isolated to be a standalone development. It is therefore incorrect for the representation to suggest that the land north of the Golf Course was overlooked.

McLaren have made representations to confirm that their land holdings will not be made available for any other use except for the purposes of meeting their future aspirations to expand. McLaren wants its land to be allocated as a strategic employment site to meet its specific future development needs. Zealand Golf Course has also confirmed that the Golf Course will not be made available for safeguarding to meet future development needs as envisaged in the consultation. Assuming the New Zealand Golf Course and the land in ownership of McLaren are unavailable there will only be sufficient land to enable the delivery of about 600 dwellings. This assumes that Surrey County Council's waste safeguarded site will be available to meet future development needs. Without the waste safeguarded site there would only be sufficient land to enable the delivery of about 300 dwellings. These estimates are based on 30dph, and it takes into account other constraints on the land such as the Ancient Woodland and areas at risk of flooding. It would therefore be unrealistic to assume that the

residual land will be capable of delivering 1,200 new homes. For information, the County Council has also made representation. At this stage, they would like to retain the safeguarding policy covering the waste and minerals safeguarded site until the review of the Plan has identified how much of the land will be needed to meet their future needs.

It is not being suggested that the entire land or parts of it could not come forward to enable the aspirations of the Council to be delivered if it is proven to be the most sustainable. The Council has Compulsory Purchase Powers, which it could use if it can demonstrate that the land is the most sustainable to meet future development needs when compared against all other reasonable alternatives being assessed. This is a decision the Council might wish to consider when it is choosing its preferred safeguarded strategy for the purposes of the Regulation 19 consultation.

In terms of roads, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as

Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00153/1/001  
**Customer Name:** Ms Wendy Hennessy

**Summary of representation:**

There are existing traffic problems along Woodham Lane and the Six crossroads roundabout and this will increase if the land east of Martyrs Lane is considered for development. The increase in population will impact the local GP Practices, Woking Community Hospital and St Peters Hospital. It would become unmanageable.

**Officer Response:**

In terms of traffic congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

In terms of infrastructure support, in particular GP practices, the community hospital and St Peters Hospital, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website. These studies have or are being reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council has adopted the community infrastructure levy (CIL) as the primary means for securing developer contributions towards strategic infrastructure provision. The levy is set at a rate that will not undermine development viability. A viability assessment has been carried out to demonstrate that residential development across the borough will achieve positive viability. Officers accept that the CIL Charging Schedule will continue to be reviewed in future to take into account new information. Nevertheless, it is not envisaged that the levy will be set at a level that will undermine development viability.

The Council's Infrastructure Delivery Plan (IDP) and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites.

**Contributor Reference:** 00136/1/001  
**Customer Name:** Ms Lucy Thomas

**Summary of representation:**

The existing infrastructure would not be able to support the development, including roads, healthcare and education provision. The development would have a serious detrimental impact on Woodham and West Byfleet area.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

It should be noted that the original six safeguarded sites were selected as they were within reasonable proximity to existing local services and facilities, such as shops, schools and health centres, as evidenced in the Sustainability Appraisal.

In terms of road congestion, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

**Contributor Reference:** 00140/1/001  
**Customer Name:** Ms Laura Whitfield

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00138/1/001

**Customer Name:** Ms Kay Pyke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00141/1/001  
**Customer Name:** Miss M A Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00142/1/001

**Customer Name:** Mr Jim Greer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00143/1/001  
**Customer Name:** Mr Terry Knight

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00144/1/001  
**Customer Name:** Ms Margaret Roderick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00147/1/001  
**Customer Name:** Mr Shaun Butler

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00149/1/001

**Customer Name:** Mr Ron Brans

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00150/1/001

**Customer Name:** Yoshi Mori

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00152/1/001

**Customer Name:** Alwyn Bowen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00154/1/001  
**Customer Name:** Mr Roger Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00155/1/001

**Customer Name:** Mr William Whittaker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00156/1/001  
**Customer Name:** Sibilla Torricelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00157/1/001  
**Customer Name:** Mr James March

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00159/1/001  
**Customer Name:** Emmanuel Bach

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00160/1/001  
**Customer Name:** Ms Jenny Bach

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00134/1/001  
**Customer Name:** Mr Jeremy Blayney

**Summary of representation:**

Development should be within the existing built up areas. The Martyrs Lane site would be a stand alone site and would be distant from existing amenities requiring people living there to drive to get to shops and schools etc.

**Officer Response:**

The Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

In terms of travelling, the Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- o Transport Assessment (2010);
- o Cumulative assessment of future development impacts on the highway network (2011);
- o Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- o Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development. Based on the evidence, it is would be wrong to assume that development at Martyrs lane would help alleviate congestion in West Byfleet than it would be for developing the six sites.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- o A245 Woodham Lane/Sheerwater/Parvis Road;
- o A320 Chertsey Road/Guildford Road; and
- o B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

Regarding the representation regarding built up areas, the Council has looked at brownfield sites, this has been fully addressed in the Regulation 18 Consultation Issues and Matters Topic Paper.

In terms of school provision on site, it is not known at this stage which type and nature of provision will be allocated. The County Council is the education provided for the area and its views on education will be seriously considered if the site is to be allocated. If the need is proven at the time of the Core Strategy and or the site allocation DPD, the council will make it a key requirement for the development of the site to be acceptable. The Council will work constructively with the County Council to identify the necessary infrastructure to support the development of the land if it is allocated and/or developed. The overriding objective of this particular exercise and at this particular stage is to make sure that any land that is safeguarded is the most sustainable when compared against other reasonable alternative.

**Contributor Reference:** 00120/3/001  
**Customer Name:** Ms Nicola Glen

**Summary of representation:**

The A320, six cross roundabout and M25 are at traffic capacity. The A320 is often closed for repair works, especially water mains.

Natural resources are already under severe pressure and the erection of so many dwellings will lead to further stress on water availability.

We need green spaces! The UK has the least woodland in the whole of Europe, we need to rethink priorities and start protecting our natural environment. Protect the woodlands and the species within.

**Officer Response:**

The representations regarding traffic impacts, Ancient Woodlands and protection of wildlife have been addressed in detail in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

Whilst the Council has been working with the County Highways Authority to identify the impact of the proposed safeguarded sites on the local road network, it is recognised that the allocation of the Martyrs Lane site could impact Junction 11 of the M25. Should the Council be minded to allocate the site for future development needs, the Council is committed to working with Highways England and the County Highways Authority to address any local and/or strategic highway matters.

In addition, Affinity Water (Veolia Water) had confirmed that based on the projected growth in the Core Strategy there is no risk to the supply of water over the plan period. The Council will continue to work with infrastructure providers and utility service providers to ensure that the necessary infrastructure is in place to serve development beyond the plan period (2027 onwards).

The Core Strategy and the Development Management Policies DPD contain robust policies to make sure that important trees and biodiversity are protected as part of any future development. Particular reference is made to Policies CS7: Biodiversity and nature conservation, CS8: Thames Basin Heaths Special Protection Areas, CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

**Contributor Reference:** 00131/1/001  
**Customer Name:** Mr Michael Widdup

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00109/1/001

**Customer Name:** Mr And Mrs Martin And Shirley Bartley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00110/1/001  
**Customer Name:** Ms Gill Talbot

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00111/1/001  
**Customer Name:** Mr Nigel Talbot

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00112/1/001  
**Customer Name:** Ms Helena Bigham

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00113/1/001

**Customer Name:** D P Williams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00114/1/001  
**Customer Name:** Ms Amy Reddick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00115/1/001  
**Customer Name:** Ms Amy Claydon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00116/1/001  
**Customer Name:** Mr Andrew Nelson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00117/1/001  
**Customer Name:** Mr Chris Claydon

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00118/1/001  
**Customer Name:** Ms Amanda Ferguson

**Summary of representation:**

The infrastructure can not support this number of houses, including the road network, healthcare facilities and education provision.

The existing trains are at capacity and the station layout is chaos.

The development will destroy the balance between housing and woodland, impacting local character and wildlife.

**Officer Response:**

Most of these issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

In addition as part of the Regulation 18 version of the Site Allocations DPD (2015), the Council identified Woking railway station for significant infrastructure works to improve the connectivity of the station with the wider area and other modes of transport. This is identified as site UA23 in the DPD.

Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. It is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 00119/1/001  
**Customer Name:** Ms Taly Harris

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00121/1/001

**Customer Name:** T Whatley

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00122/1/001  
**Customer Name:** Mr Ben Hacking

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00123/1/001  
**Customer Name:** Mr Hussain Anjum

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00124/1/001  
**Customer Name:** Ms Gemma Pickett

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00125/1/001  
**Customer Name:** Ms Sarah Cook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00126/1/001  
**Customer Name:** Mr Nick Greenhouse

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00127/1/001  
**Customer Name:** Ms Kate Douglas

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00128/1/001  
**Customer Name:** Ms Caroline March

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00129/1/001  
**Customer Name:** Ms Gemma Lane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00130/1/001  
**Customer Name:** Mr Simon Lane

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00096/2/001  
**Customer Name:** Mr Robert Shatwell

**Summary of representation:**

Objects to the principle of Green Belt development. All of the safeguarded sites are floodplains or areas of outstanding natural importance. The Council continually state that it will protect Green Belt land.

None of the proposed sites have good infrastructure provision, including road networks and education and healthcare facilities. Any costs to improve or create new infrastructure will make development unviable.

Development of these sites would require the loss of hundreds of mature and healthy trees which are important to reduce flood risk. The loss of trees would increase flood risk on site and locally. The Council would be responsible for any damage caused by flooding.

Trees also absorb CO2 and the loss of trees would have an adverse impact on air quality and in turn the quality of life for residents.

Development would have an adverse impact on the wildlife enjoyed by residents.

There is no evidence to demonstrate that more housing is required.

Green Belt land is also important for agriculture and local food production.

**Officer Response:**

The Council's response to the representation regarding the principle of Green Belt development and the need to safeguard land for future development needs has been addressed previously in the 'Site Allocations DPD Issues and Matters Topic Paper'. In particular, Sections 1.0 and 2.0.

In addition, the representations regarding flooding, landscape and infrastructure have also been addressed in the Regulation 18 Consultation Issues and Matters Topic Paper. Please refer to Sections 3.0, 5.0 and 7.0 respectively.

Regarding the Martyrs Lane site in particular, the Council has addressed the representations relating to infrastructure provision, flooding, wildlife and Ancient Woodland in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper.

The Council is fully committed to the comprehensive delivery of the Core Strategy which sets out that at least 4964 net additional dwellings will be delivered over the plan period. The Core Strategy is based on a number of evidence base documents including the Strategic Housing Land Availability Assessment and the Strategic Housing Market Assessment. The full list of

evidence base studies used to justify the Core Strategy is at Appendix 1 of the Core Strategy. A number of these documents have also been reviewed since the adoption of the Core Strategy to ensure that the Site Allocations DPD is based on up to date and robust evidence.

As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The proposed safeguarded sites are not classified as high quality agricultural land by DEFRA. Whilst it is agreed that agricultural land is important for sustainable food production, it should be noted that these particular sites are of low soil quality.

**Contributor Reference:** 00094/1/001  
**Customer Name:** Ms Caroline Blackney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00095/1/001  
**Customer Name:** Mr Barry Richards

**Summary of representation:**

The existing road network is already congested.  
The proposal would create infrastructure and environmental issues.  
The proposal makes no sense.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00097/1/001  
**Customer Name:** Mr Carl Francis

**Summary of representation:**

The infrastructure and road network are already at breaking point.

**Officer Response:**

These issues have been addressed in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Contributor Reference:** 00098/1/001

**Customer Name:** Dr Nick Lance

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00099/1/001  
**Customer Name:** Ms Jennifer Butcher

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00100/1/001  
**Customer Name:** Mr Tony Thompson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00101/1/001

**Customer Name:** Mr Bill Bruno

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00102/1/001

**Customer Name:** Lesley Hunt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00103/1/001

**Customer Name:** Mr Mark Hunt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00104/1/001

**Customer Name:** Lesley Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00105/1/001  
**Customer Name:** Mr Simon Hacking

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00106/1/001  
**Customer Name:** Ms Vivien West

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00107/1/001  
**Customer Name:** Mr Victor Laming

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00132/1/001  
**Customer Name:** Mr Simon Baker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00133/1/001  
**Customer Name:** Mr David Dowling

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00133/2/001  
**Customer Name:** Mr David Dowling

**Summary of representation:**

The proposal is wrong for many reasons. If it is not already then it should be designated as Green Belt.

The local infrastructure is already at capacity or in poor condition such as the road network and water supplies. There has also been a loss of schools and healthcare provision recently. Woking Town Centre and West Byfleet have already delivered significant housing towards national requirements.

**Officer Response:**

The site is already within the Green Belt. The purpose of the consultation is to determine whether this site is a suitable and sustainable alternative to be removed from Green Belt for future development needs compared with the six sites identified in the draft Site Allocations DPD (2015). The Council's Core Strategy, adopted in 2012, sets out that at least 4,964 new dwellings will be delivered across the Borough up to 2027. The Council is fully committed to delivering the Core Strategy in full. As part of the Site Allocations DPD process, the Council is also taking account of national planning policy (NPPF) to identify and safeguard land for future development needs.

To ensure sustainable development, the Council is always concerned to make sure that development is supported by the necessary social, physical and green infrastructure, and would agree that a development of this nature and scale will require different types of supporting infrastructure to be sustainable. There are two stages for identifying the nature and extent of the infrastructure that will be needed. The first is during the plan making stage and the second through the development management process. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan. These studies are reviewed to bring them up to date. At the development management stage, detailed impact assessment of specific proposals will be fully assessed to help determine site specific measures of mitigation that might be necessary. Contributions under Section 106 Agreement will be secured to deliver these site specific measures.

The Council has adopted the community infrastructure levy as the primary means for securing developer contributions towards strategic infrastructure provision. The levy is set at a rate that will not undermine development viability. A viability assessment has been carried out to demonstrate that residential development across the borough will achieve positive viability. Officers accept that the CIL Charging Schedule will continue to be reviewed in future to take into account new information. Nevertheless, it is not envisaged that the levy will be set at a level that will undermine development viability.

The Council's Infrastructure Delivery Plan and the Surrey Infrastructure Study provide useful information in quantifying the nature and type of infrastructure needed to support the future growth of the area and the likely cost of providing them. Both studies are on the Council's website and are presently being reviewed to bring them up to date. CIL and S106 contributions will provide significant funding for the infrastructure necessary to support the development of the site and indeed for the development of any of the other proposed six safeguarded sites. However, it has always been very clear to the Council that infrastructure funding has never been and cannot be met entirely by developer contributions. Public sector contributions has and will always be a significant part of infrastructure funding, and the Council works tirelessly with relevant agencies to secure public sector and other sources of funding for infrastructure projects. For example, the CIL Charging Schedule identifies the priority infrastructure to support the delivery of the Core Strategy, how much they will cost, how much of the funding will met from developer contributions and how much is expected to be secured from public sector sources. This gives an indication of the scale of public sector funding expected to help deliver the identified infrastructure.

The Council is aware that some of the infrastructure implications for developing the site at Martyrs Lane could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. An example is the traffic implications for developing the Martyrs Lane site and the potential developments at Fair Oaks in Surrey Heath and Longcross in Runnymede.

There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Martyrs Lane proposal. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. The Council is also working constructively with Surrey County Council who is the education and transport providers for this area to quantify the transport and education provision needed to support the development and how they could be delivered. All other relevant infrastructure and utility providers are also consulted to help assess the infrastructure needs to support future growth. The Council is satisfied that if the site were to be safeguarded, it can be sustainably developed with the necessary infrastructure delivered to support it without undermining development viability.

**Contributor Reference:** 00108/1/001  
**Customer Name:** Mr Robert Hopkins

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00028/1/001

**Customer Name:** Mrs T Brewer

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00029/1/001  
**Customer Name:** Ms Laura Marczewski

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00030/1/001  
**Customer Name:** Mr David Langton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00031 /1 /001  
**Customer Name:** Ms Helen Clothier

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00032/1/001  
**Customer Name:** Mr Richard Grimmett

**Summary of representation:**

The provision of housing is based on supply and demand. By stopping net immigration then fewer houses are required and will prevent over-development of the local area.

**Officer Response:**

The Core Strategy makes provision for at least 4964 net additional dwellings across the Borough over the Plan period. The Council is fully committed to the comprehensive delivery of the Core Strategy and is therefore preparing the Site Allocations DPD to identify specific sites to facilitate this development.

Based on national planning policy requirements, the Council is also looking to safeguard land for future development needs between 2027 and 2040. This land will only be released for development following a review of the Core Strategy and or the Site Allocations DPD. During this review, the Council will consider population trends and projections in calculating its future housing requirements.

It should be noted that immigration policy is not set at a local level.

**Contributor Reference:** 00033/1/001  
**Customer Name:** Ms Kate Gulliver

**Summary of representation:**

Support for the Martyrs Lane site as it is derelict and would enable a new community to be developed. Development could not be supported in Pyrford.

**Officer Response:**

Support and merits of the site noted. This will weigh in the balance of considerations by Members.

The Council notes the representation outlining reasons against safeguarding land for future development needs in other areas of the Borough. This will be taken into account to inform the preferred approach to safeguarding.

Further details can be found in Officers' Response to the Regulation 18 Site Allocations DPD consultation.

**Contributor Reference:** 00034/1/001  
**Customer Name:** Ms Maggie Howe

**Summary of representation:**

Support for the site but development should consider how to protect Horsell Common from an increase in dog walkers and recreational users

**Officer Response:**

Support for the site is noted.

The Council is aware of local ecological sites such as the Thames Basin Heaths SPA. As stated in the Consultation Paper, the Council would require any future development of the site to bring forward the necessary infrastructure to support the site. This includes green infrastructure. Therefore whilst the site is in close proximity to Horsell Common, the provision of on-site green infrastructure as well as SANGs across the Borough should mitigate any potential adverse ecological impacts.

**Contributor Reference:** 00048/1/001

**Customer Name:** Mr Dave Hall

**Summary of representation:**

Objects to all of the proposed safeguarding options. The development of these sites will cause chaos based on the existing infrastructure provision.

The only way to relive pressure on overcrowded areas is by creating new towns and villages. Wisley Airfield is not such a bad idea alongside Dunsfold. These would enable modern infrastructures, new schools & health facilities as well as good access to all amenities & in turn would mean the existing areas will thrive with a healthy environment.

Redeveloping Milford would make sense with well thought out infrastructure and open space to create a town with excellent facilities. 2000 homes west of Guildford is crazy based on traffic congestion.

The Sheerwater Regeneration Scheme makes sense.

The road networks such as the M25, A3 and M3 have major issues already. The new plans for the A3 Painshill intersection are excellent.

However housing is in a shocking situation and government should force developers to deliver housing within a reasonable time frame from the point permission is granted.

It takes longer to get to work and school and affects the quality of life and well being of residents. The pressure on existing services should be relieved to encourage a better quality of life. Development proposals cause local anguish and anger and result in less green space, more traffic and construction disruption including traffic, noise and air pollution. In turn this puts further pressure on the health service.

These proposals will not solve the housing problem and will make things worse.

Housing with insufficient parking adds to the problem. There is a lack of developer and Council understanding and too much emphasis on maximizing the number of houses over functional homes and the environment. Modern day society is failing putting more pressure on everyone.

Land owners, despite a housing shortage, are able to sell land with planning permission for huge financial gains whilst developers and individuals are unable to purchase land and develop it viably. This is extortion. By changing this it would free up land for development.

Ransom strips should be abolished or a standardised methodology brought in to calculate land costs. Once planning permission is granted there should be no further costs later in the

process by landowners increasing land prices. If overage rights aren't allowed then it would free up hundreds of plots for self-builders & developers to build on.

Smart thinking is required to house a large population on a small island.

The safeguarding proposals are narrow minded and grasping at straws. New towns & Villages with modern infrastructure & facilities is the only way to prevent England from becoming one massive city.

**Officer Response:**

Objection to the proposed safeguarded sites is noted.

Regarding the representation on infrastructure provision, the Council will make sure that the development of any land that it safeguards is supported by adequate and necessary infrastructure. This will be the case irrespective of whether it is a single site or multiple sites. The Council's Core Strategy, in particular Policy CS16: Infrastructure Delivery and CS18: Transport and accessibility, sets out how the necessary infrastructure will be delivered to support development. As part of the plan making process, the Council has carried out a number of studies to quantify the broad nature and type of infrastructure that will be needed to enable the delivery of the Core Strategy. An example is the Infrastructure Delivery Plan which is available on the Council's website.

The Council has adopted the community infrastructure levy (CIL) as the primary means of securing developer contributions towards infrastructure provision. By this approach, the Council determines the list of projects and the priority order that it wishes to use CIL contributions. This will include infrastructure to support the development of any of the safeguarded land. Section 106 contributions will only be secured towards infrastructure that is specifically necessary to bring forward the development of a particular site. Generally, the Council will seek to make sure that the implications of development where they occur are fully assessed and measures of mitigation put in place to address or minimise the impacts.

Whilst the Council notes the support for Wisley Airfield, Dunsfold and Milford, it should be noted that these sites are not located within Woking Borough. The Council is fully committed to the comprehensive delivery of the Woking Core Strategy which seeks to facilitate the delivery of 4964 dwellings over the plan period up to 2027. Most of these sites are located within the existing urban areas of the borough, namely Woking town centre. In addition to this, the Site Allocations DPD seeks to safeguard land for future development needs between 2027 and 2040. By not allocating land for development within the borough, the Council will be unable to deliver the development needs of the borough which includes both private and affordable housing as well as economic and retail floorspace.

As part of the Site Allocations DPD process the Council considered about 125 sites in total. Based on the Council's evidence, including the Sustainability Appraisal, none of the alternative sites would be able to deliver a new town or village within the borough.

Regardless of the Council's preferred safeguarding strategy, the social and environmental implications of development will be fully assessed as part of the development management process, and appropriately mitigated. There are environmental standards for development to achieve and the Council will make sure that they are met. For example, policies DM5 to DM8 of the Development Management Policies DPD require development to be designed to avoid unacceptable impacts on the quality of life of communities from noise, light and environmental pollution.

Support for the Sheerwater Regeneration Scheme is noted. The site was included in the draft Site Allocations DPD which was published in 2015.

Regarding the existing road network, the Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

The Government has recently published the Housing White Paper: Fixing Our Broken Housing Market. Within this it suggests a number of measures to speed up the rate of development delivery. The consultation on the White Paper has now concluded and the outcome of the consultation is expected to be announced shortly.

The representation regarding disruption to existing communities is a matter that has been addressed in the Regulation 18 consultation Issues and Matters Topic Paper. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

The Council has Parking Standards that future development should comply with. These standards are currently being updated by the Council to reflect national planning policy requirements. The Council also has design policies and guidance in place to ensure that future development is built to a high standard.

The representation regarding overage rights and ransom strips are not planning considerations as they are legal matters. Nevertheless, the Council could consider using its Compulsory Purchase Powers to acquire land if it facilitated the delivery of development. The Council has used these powers previously and will consider doing so again if necessary.

Based on the Council's existing planning policy requirements, it is satisfied that future development will be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Overall, the Council is

satisfied that the social, environmental and economic character of the area will not be significantly undermined.

**Contributor Reference:** 00026/1/001  
**Customer Name:** Ms Michele Barker

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00042/1/001

**Customer Name:** Mr Chris McLoughlin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02637/1/001

**Customer Name:** Woodham And Horsell Neighbourhood Forum

**Summary of representation:**

The following are the objections to your planned inclusion of the land to the east of Martyr's lane in the DPD, and removing this land from Greenbelt and safeguarding this for future development.

New homes should be sustainable within the borough without placing all of the burden on a single ward. Using several sites over the borough would be far more sustainable and have less overall impact on the borough infrastructure facilities.

1. The land east of Martyrs Lane makes an important contribution towards preventing urban sprawl. Safeguarding it for future development needs will lead to urban sprawl and the merging of settlements. This is highlighted by the Council's own evidence. There are no special circumstances to justify the release of the land from the Green Belt for development. The Council went against Green Belt guidance to grant planning permission for McLaren to develop the northern part of the land, and as such the non-implementation of the planning approval should not be used as justification for promoting residential development on the site. The proposal does not take into account significant proposed developments in adjoining boroughs such as the proposed Fair Oaks Garden village proposal in Surrey Heath Borough. Cumulatively, these developments will lead to urban sprawl.

2. The land has high risk of flooding and parts of it are in Flood Zones 2 and 3. There are real recorded incidences of flooding on the stretch of the A320 near the site. There are other areas within the Borough of lesser risk that could be developed. Development will exacerbate existing flood risk in the area, and the cost of mitigation would be significant enough to affect the viability of developing the entire land. In accordance with the NPPF, the development of the site will require a site specific flood risk assessment by reason of its scale. The risk of flooding could affect the insurance of properties.

3. The original proposals in the draft Regulation 18 Site Allocations DPD would distribute development traffic across the borough. The Martyrs Lane proposal will concentrate all the traffic impacts on one heavily congested area. There is lack of public transport in the area, the surrounding roads are already congested and the additional development will exacerbate the situation. Roads that will be severely affected are the A320, Martyrs Lane, Woodham Lane. This could have implications on operations at McLaren, on local residents and would increase pollution.

4. There is lack of public transport connectivity. Only two bus routes serve the area and one is about to be withdrawn. Trains are under severe strain and punctuality is terrible. South West Trains provide appalling service.

5. The area has not got a transport policy other than one that promotes a huge amount of car travel. This would lead to a judicial review of the Site Allocations DPD. The transport system needs to be balanced in favour of sustainable transport modes.
6. The A320 has experienced severe sink holes in the past few years. A strip of land to the north of the site is susceptible to collapse/subsidence due to piping and liquefaction.
7. The development of the site will not amount to sustainable development, contrary to the requirements of national planning policy.
8. The scale of the development will require major infrastructure of every conceivable type to support it. This will come at a significant cost that cannot all be borne by developers. It will also need significant public funding. The infrastructure needs of the development will need to be studied with appropriate consultation with the relevant providers. Residents might have to draw on infrastructure within other boroughs and there is no indication that those authorities have been consulted.
9. Most of the land has remained untouched for many years and is wildlife rich. There are protected species such as bats, owls, nightjar and Dartford warbler on the land. There has not been any formal study to assess the ecological significance of the site.
10. The site contains an area of Ancient Woodland, which is likely to have veteran trees. In accordance with Government policy, Ancient Woodland has to be protected. A survey has to be undertaken to assess whether any further areas would not be classified as Ancient Woodland. A lot of the trees on the site are subject to TPO.
11. The site will be under several flight paths due to the expansion of Heathrow and flights from Fairoaks. It will not be suitable to live under the flightpaths by reason of noise and potential accidents.
12. The site includes a recycling centre that already generates significant traffic. There are also social and environmental reasons for not living near a recycling centre.
13. Canalside Ward will be the only Ward to be significantly developed. The development of the site would require the Council to use its compulsory purchase powers to acquire land. No Government minister will approve a Compulsory Purchase Order application as there are other better options. The Council is already financially stretched. The fact the Council is focusing all its development needs at a single location will be used as a reason for a judicial review.
14. The make up of the LDF Working Group is unrepresentative. The councillors on the Working Group are only from the south of the borough and are biased towards certain areas. The Group should be re-formed to make it much more representative. The decision of the Group was based on 'not in my backyard' mentality.

15. Many parts of the land will not be available for development. The owners of the New Zealand Golf Course have openly confirmed that their land will not be available for development as envisaged by the Council. Potentially, the land in the ownership of McLaren will also not be available for the proposed development. The Council via a Councillor has stated that the whole proposal is a waste of time, effort and public money.

16. The proposed Martyrs Lane development would go against the values set out in the Natural Woking Strategy.

17. The Landscape Assessment by Hankinson Duckett Associates concludes that this land is not suitable for development.

18. Other issues including the history of the golf club, poor mobile phone and broadband connectivity and the impact on neighbouring boroughs.

Appendix attached.

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00024/2/001  
**Customer Name:** Ms Tammy Dexter

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00043/1/001  
**Customer Name:** Ms Nicola Howard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00044/1/001  
**Customer Name:** Ms Geraldine Laing

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00045/1/001  
**Customer Name:** Mr David Thorne

**Summary of representation:**

Mayford does not have the adequate infrastructure to support development

**Officer Response:**

The Council notes the representation outlining reasons against safeguarding land for future development needs in other areas of the Borough. This will be taken into account to inform the preferred approach to safeguarding.

Further details can be found in Officers' Response to the Regulation 18 Site Allocations DPD consultation.

**Contributor Reference:** 00041/1/001  
**Customer Name:** Mr Matthew Ryder

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00046/1/001  
**Customer Name:** Mr David Cottle

**Summary of representation:**

Supports the draft allocation as it would cause less disruption to existing residents of the Borough. As a building protect it would also be more efficient than a piecemeal approach.

**Officer Response:**

The representation regarding disruption to existing communities is a matter that would be considered in detail at the Development Management stage. This would include the impact of construction and construction traffic as well as the impact of development on existing services, facilities and infrastructure. This assessment will be required regardless of whether the Council safeguards land to the east of Martyrs Lane or the other six sites.

**Contributor Reference:** 00047/1/001  
**Customer Name:** Mr Chris Hacking

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00049/1/001

**Customer Name:** Mr K R Clarke

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00055/1/001  
**Customer Name:** Mr Nigel Oliver

**Summary of representation:**

The proposed site is well served by the existing road network and is capable of taking additional traffic, unlike the sites identified in Saunders Lane.

One fifth of the site has already been granted planning permission for a Technology Centre and therefore its removal from the Green Belt is not an issue.

The site is adjacent to locally listed buildings but there are no statutory listed buildings unlike Saunders Lane.

**Officer Response:**

The Council has carried out the following separate studies to quantify and forecast vehicular trips and distribution that would be generated by various development options to enable the delivery of the Core Strategy and future development needs:

- Transport Assessment (2010);
- Cumulative assessment of future development impacts on the highway network (2011);
- Green Belt boundary review sensitivity test – Strategic Transport Assessment (2015);
- Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment (2016).

The collective outcomes of these studies have provided a good understanding of the highway impacts for developing the various sites tested for development.

The Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment specifically calculates the quantum and distribution of vehicle trips resulting from various development options at land east of Martyrs Lane and other development scenarios, including the original six safeguarded sites and the forecast of the highway impacts of development of these sites. Overall, this assessment concluded that the scale of the forecast highway impacts vary in each of the Green Belt development options tested. There is a direct result of the number of additional trips generated from each scenario varying according to the number of proposed residential dwellings in each of the development scenarios.

The forecast highway impacts of the trips that will either be generated from development at Martyrs Lane or at the six safeguarded sites are likely to exacerbate existing levels of congestion, instead of creating new areas. Both development options are expected to exacerbate congestion at the following same traffic hotspots:

- A245 Woodham Lane/Sheerwater/Parvis Road;
- A320 Chertsey Road/Guildford Road; and

- B382 Old Woking Road.

In addition, it is also likely that the additional trips generated from development at Martyrs Lane would cause trips to re-route and thus generate additional pressure on areas such as Maybury, Pyrford and Sheerwater. It might also be likely that there would be some re-routing to local roads for developing the six sites.

The studies also confirm that the development of any of the options considered for safeguarding will require necessary and appropriate measures of mitigation to address forecast traffic and ensure the sustainable development of the sites.

The studies recommend that both hard and soft measures of mitigation should be explored to deal with the forecast highway impacts. In addition, each of the allocated sites will be required to undertake detailed transport assessment to determine any site specific mitigation measures that would be necessary to bring forward the development.

The Council is working in partnership with the County Council to explore and determine feasible and deliverable strategic highway measures of mitigation to minimise any development impacts. This work is on-going and will be completed before the DPD is submitted for Examination. Highways England has been consulted to seek their views on the implications of safeguarding the land east of Martyrs Lane on the trunk road network and in particular, connection to the M25. Their response will be addressed separately and taken into account.

It is acknowledged that part of the site was granted planning consent for employment uses and it is accepted that the planning decision and the planning history of the site is a material consideration that needs to be taken into account. Nevertheless, it is highlighted that the determination of a planning application is a distinct planning process different from a Site Allocations DPD process. The Site Allocations DPD process and the question for the Martyrs Lane consultation in particular are in an entirely different context whereby the relative merits of alternative sites are being considered across the entire plan area. This is different from a development management process that seeks to determine a planning application based of the individual merits of the particular proposal.

Regarding the representation on heritage assets, neither the land east of Martyrs Lane nor the six safeguarded sites are covered by constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect heritage features within and in close proximity to any of the sites being consulted. If any of the sites were to be safeguarded, the Council has robust policies to make sure that their development does not compromise the heritage assets of the area.

**Contributor Reference:** 00035/1/001  
**Customer Name:** Ms Rebecca Haddow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00036/1/001  
**Customer Name:** Mr George Topping

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00037/1/001

**Customer Name:** Ms Emma Watson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00061 / 1 / 001  
**Customer Name:** Ms Beryl Clavey

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00060/1/001  
**Customer Name:** Ms Dawn Playfoot

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00062/1/001

**Customer Name:** Adam

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00063/1/001  
**Customer Name:** Mr Antony Green

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00064/1/001  
**Customer Name:** Mr D Westbrook

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00065/1/001  
**Customer Name:** Ms Maria Quinnell

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00066/1/001  
**Customer Name:** Mr E D'Arienzo

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00067/1/001  
**Customer Name:** Ms Victoria Page

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00068/1/001

**Customer Name:** Sam Doherty

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00069/1/001  
**Customer Name:** Mr Simon Eaton

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00070/1/001  
**Customer Name:** Ms Beryl Hennessy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00071 / 1 / 001  
**Customer Name:** Ms Ann Peake

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00072/1/001  
**Customer Name:** Mr Andrew Drysdale

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00073/1/001  
**Customer Name:** Ms Christine Iannelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00074/1/001  
**Customer Name:** Mr Giuseppe Iannelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00075/1/001  
**Customer Name:** Mr Giuliano Iannelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00076/1/001  
**Customer Name:** Ms Isabella Iannelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00077/1/001

**Customer Name:** Mr Giovanni Iannelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00078/1/001

**Customer Name:** Ms Carmina Iannelli

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00079/1/001  
**Customer Name:** Mr Brian Barrow

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00080/1/001  
**Customer Name:** Ms Lisa Leonard

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00081 / 1 / 001  
**Customer Name:** Mr Andy Dams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00082/1/001

**Customer Name:** Ms Andrea Alestrand

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00083/1/001

**Customer Name:** Jovita Dams

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00084/1/001  
**Customer Name:** Ms Karen Patrick

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00038/1/001  
**Customer Name:** Ms Jacy Gorton

**Summary of representation:**

Understands the need for more housing but Pырford does not have the necessary infrastructure to support it. There would also be negative impacts on local biodiversity.

**Officer Response:**

The Council notes the representation outlining reasons against safeguarding land for future development needs in other areas of the Borough. This will be taken into account to inform the preferred approach to safeguarding.

Further details can be found in Officers' Response to the Regulation 18 Site Allocations DPD consultation.

**Contributor Reference:** 00027/1/001  
**Customer Name:** Ms Debbie Margaroni

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00039/1/001  
**Customer Name:** Ms Vicki Morganti

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00228/1/001  
**Customer Name:** Ms Liz Saunders

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00050/1/001

**Customer Name:** S Laukkanen

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00051/1/001  
**Customer Name:** Mr Neil Mahoney

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00052/1/001  
**Customer Name:** Mr Matthew Verran

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00053/1/001  
**Customer Name:** Ms Sarah Whitlock

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00054/1/001  
**Customer Name:** Ms Abigail Smith

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00056/1/001  
**Customer Name:** Ms Jane Knowles

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00057/1/001

**Customer Name:** Pip Barnes

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00058/1/001

**Customer Name:** Mr Eric Vardy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00059/1/001  
**Customer Name:** Ms Margaret Perks

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00085/1/001  
**Customer Name:** Ms Angela Vardy

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00086/1/001

**Customer Name:** Ms Nikki Pitt

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00087/1/001  
**Customer Name:** Ms Carol Pasquill

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00088/1/001  
**Customer Name:** Ms Angela Robinson

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00089/1/001  
**Customer Name:** Ms Eleanor Jacques

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00090/1/001  
**Customer Name:** Mr Mark Trinder

**Summary of representation:**

The consultation process is unfair as vested interests will be heavily balanced on one side.

Mixed views on the proposal. Better to spread development across the Borough but the site does benefit from transport connections to the A320 and M25.

**Officer Response:**

It is important to emphasise that the decision to consult on the possibility of safeguarding the land east of Martyrs Lane was made by a vote of Full Council. The decision of what site(s) to include within the Regulation 19 version of the Site Allocations DPD will also be made by a vote of the Full Council.

For the Site Allocations DPD to be found sound, the Council has to identify the most sustainable land to meet its future development needs. This must be the most sustainable when compared with all other reasonable alternatives. A number of studies have been undertaken to enable the Council to make an informed decision on this matter. The spatial distribution of development is therefore driven by sustainability and not by ward boundaries.

The merits of the site as set out in the representation are noted and will weigh in the balance of considerations by Members.

**Contributor Reference:** 00091 /1 /001  
**Customer Name:** Ms Elizabeth Robshaw

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00092/1/001  
**Customer Name:** Ms Eira Meller

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00093/1/001

**Customer Name:** Ms Patricia Edwards

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 00025/2/001  
**Customer Name:** Ms Holly Franklin

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.

**Contributor Reference:** 02917/1/001

**Customer Name:** D Court

**Summary of representation:**

Summary of representation can be found in the Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper

**Officer Response:**

The Council's response can be found in the 'Woodham and Horsell Neighbourhood Forum Issues and Response Topic Paper'.