

## **Written Representation regarding greenbelt sites GB4 and GB5. Byfleet Greenbelt.**

**Have all reasonable alternatives to the release of greenbelt sites been adequately explored and have all reasonable options for meeting the Core Strategy requirements been fully examined?**

I feel the answer to this is still definitely no.

- There has still never been a full and proper search and review of brownfield sites.
- Significant developments, which are in the process of going ahead or are planned for the near future, have inexplicably continued to be omitted or recorded inaccurately within the DPD.
- These include: additional housing at Broadoaks, Sheerwater, Victoria Square and Woking Football club, all of which have progressed significantly during the consultation process but are not included accurately in the DPD.

The additional currently omitted dwellings from these developments mean that there is in fact now no need at all to develop greenbelt and no exceptional circumstances exist. The DPD and greenbelt review have still not, ever been updated to reflect this.

The DPD appears to have “lost sight” of its actual purpose which is to deliver a sufficient amount of housing. It seems to have adopted an unwavering emphasis on developing greenbelt even though there is no justification for this.

**For GB allocations scheduled later in the Plan period, are these in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged?**

I do not feel that sites GB4, GB5 meet this requirement. For the following reasons:

### **Ownership**

Part of GB5 is future burial land owned by St Mary’s church, Byfleet. This land is not available for any development or road access. Woking Council did not appear to be aware of the correct purpose or ownership of this land. However, despite now having been informed that this is church land Woking Borough Council still continue to include it within their plans despite the landowner, Rev John McCabe, being totally opposed to this.

### **Long term sustainability**

If there was development of GB4 and GB5 is very likely to not be sustainable over the long term due to the future likelihood of HS4 Air. Questions regarding this have still not been adequately answered during any of the consultation process to date.

HS4 Air is a planned rail line following the course of the M25, It would run through GB4 and GB5.

- Woking Borough Council have not ever considered or addressed the impact of the HS4 Air transport plans on these two specific areas of land.
- When questioned in 2018 at a community meeting regarding this national transport project, it was clear that Ernest Amoako had no knowledge of HS4 Air and was unaware that proposals were in fact at that time actively being tendered to the Department of Transport that directly impacted on both sites GB4 and GB5.
- This transport project is regularly raised as a future major transport plan for the South East, since it was first put forward in 2002. It is specific to Byfleet and is known about by Byfleet residents but does not impact on any wider area within Woking which may be the reason why it has not been considered within the DPD.

For reference, a diagram of the December 2018 proposals – rail line to be constructed along the route of the M25 incorporating sites GB4 and GB5.



- The current status of this project as at November 2019 is that the first stage of this project “The Heathrow Southern Railway” (HSR) is approved and awaiting a start date. It is hoped to be completed by 2026. This is a rail link from Heathrow to Staines and Woking.
- The next logical step of this major project would be the rail link extension to Gatwick and the construction of the rail line along the M25 route through GB4 and GB5. This would be at a future, as yet unknown date.
- The building of houses on these sites would adversely impact of this National Transport project. Detailed consideration to this should have been undertaken in the DPD with a proper assessment of how these plans impact now and in the future on these areas.
- The DPD does not refer to or consider this project at all. When questioned at a public meeting it was clear planning officials had no knowledge at all of the existence of this project.

- The cost of the current Transport project HS2 has escalated due to the cost of compulsory house purchases and the need to pay compensation to nearby home owners. Houses on GB4 and GB5 will cause the same issues for the HS4 Air project. Potentially this will also impact on GB10.
- There is also always the potential for M25 widening in these areas. Again this would cause houses here to not be sustainable over the long term.

These errors in respect of ownership and HS4 Air do, in my opinion, show a general lack of thoroughness and accuracy within the greenbelt review and the DOD.

**Does the Greenbelt review pay appropriate regard to the Greenbelt purpose of preserving the setting and special character of historic towns.**

**Plus**

**Does the methodology of the greenbelt review place appropriate emphasis on the purposes and permanence of the greenbelt.**

No. GB4 and GB5 have always and continue to fully achieve their greenbelt function of preventing urban sprawl. The development of GB4, GB5 and also GB10 in West Byfleet would in effect merge the 2 villages together.

Preventing urban sprawl continues to be an important function of these areas of greenbelt which still appears to have been completely disregarded by the review. These greenbelt areas are not in any way “underperforming” or of “low quality”.

Byfleet and West Byfleet are completely separate villages. Byfleet is a Domesday Village and the home of Byfleet Manor, a former Royal Palace. West Byfleet is a newer village and separate in its own right.

Without GB4, GB5 and GB10 the M25 will be all that separates them. The M25 is a road not a boundary.

The DPD and greenbelt review still completely fails to address this.

The removal of the Pyrford greenbelt sites and Martyrs Lane site whilst retaining the Byfleet and West Byfleet sites for development has also never had a satisfactory explanation. I do not feel that it was appropriate for Cllr Ashley Bowes to have been so fundamentally involved in this decision as he is a Pyrford Councillor and Pyrford resident. It is very hard to prove complete neutrality when making decisions that impact so significantly on both a personal and political basis and therefore this shows yet another significant flaw in the processes undertaken.

**Are the sites in a suitable location?**

Sites GB4 and GB5 are not in suitable locations for development.

- Access to GB4 is very limited and will either involve unsafe access on to Parvis Road (due to the location of the bridge over the M25) or will involve a possible road being built on part of Byfleet Recreation Ground and yet more erosion of green space in Byfleet. No suitable alternative has been put forward.
- Access to GB5 is also very limited and, now that Woking Council have recently had to acknowledged they will not be able to build the originally planned access road across the church owned land, there is no safe entry and exit point. Road access onto Rectory Lane will be too close to a blind bend and the local Primary School.
- The southern part of Byfleet as a whole only has 3 access and entry points which are all onto the already congested Parvis Road. This already results in a bottle neck effect for vehicles trying to leave the village. GB4, GB5 and GB10 in West Byfleet will all have a cumulative effect on traffic flow on to Parvis Road/Old Woking Road. The cumulative effect of all the potential planned developments have never been considered on infrastructure.
- Sites GB4 and GB5 also incorporate and border flood plain. I understand planning policy now does not permit any development to worsen the flood risk in any other area. Water displacement from development on GB4 and GB5 would cause increased flood risk to other nearby properties. Byfleet has flooded extensively in 1968, 2000, 2003 and 2013/14. The DPD still does not address this. The Environment Agency has recently identified the need for flood defences in Byfleet due to the high flood risk but these have not been put in place.

**Planning Policies should enable and support healthy lifestyles, especially where this would address identified local health and well being needs, for example through the provision of safe and accessible green infrastructure.**

A small area of SANG has been put forward in Byfleet (GB15).

This is not suitable or adequate due to:

- This area is subject to regular extensive flooding and is not actually accessible by road or foot due to the M25 separating it from the main part of Byfleet.
- This area is too small compared to the size of GB4 and GB5 and also GB10.

Byfleet residents already have access to significantly less green space than other areas within Woking. These developments further worsen this position.

### **Biodiversity Net Gain**

It is planned that the Government will require developers to deliver biodiversity net gain, under the forthcoming Environment Bill.

Development of Greenbelt could not realistically provide a biodiversity net gain.

**Overall suitability of including any safeguarded greenbelt beyond the Plan Period.**

GB4 and GB5 are proposed as safeguarded sites in order to meet future, yet unknown, needs from 2027 to 2040.

Woking Borough Council have stated that the role of the DPD is to implement the Core Strategy. The DPD should not therefore, go beyond the scope of the Core Strategy and it is not justified to exceed site allocations beyond the Plan end date of 2027. No urban sites have been safeguarded beyond the plan term.

Very recently proposals for approximately 3000 future dwellings at Victoria Arch have been announced. These would provide brownfield housing to meet the need beyond the Plan period.

For these reasons as well as those listed above, there is a very strong case for the removal of sites GB4 and GB5 from the DPD.

**From Lynn Cozens, Byfleet Resident.**