

Statement for the Woking Site Allocations Development Plan Document Examination

Matter 2

Prepared For
**Byfleet, West Byfleet and
Pyrford Residents Association**

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CHARTERED TOWN PLANNERS

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1 INTRODUCTION

- 1.1 We enclose representations to Matter 2 of the Woking Borough Site Allocations DPD Examination on behalf of our client the Byfleet, West Byfleet and Pyrford Residents Association. In this matter we are aware that the Byfleet, West Byfleet and Pyrford Residents' Association are liaising with West Byfleet Neighbourhood Forum (in particular GB10) and Byfleet Residents Neighbourhood Forum (in particular GB4 and GB5).
- 1.2 We have limited our response to the key issues of relevance to our client.
- 1.3 The Byfleet, West Byfleet and Pyrford Residents Association is a very active group of local residents who care for the Byfleet, West Byfleet and Pyrford area of Woking Borough. Their membership is around 2,600 households, and they have been in existence for over 90 years. Any local resident is welcome to join and the Association is independent of any political party. They seek, and listen to, the views and concerns of local residents and take action in support. The Association has its own website (<https://the-residents.org>) and publishes three newsletters a year.
- 1.4 The particular concern of our client is the proposed allocation of the land around West Hall in West Byfleet, which is given the reference GB10. Our assessment of this allocation is that it is unsound and should be removed from the Plan.
- 1.5 The additional concerns of our client relate to the 'safeguarded land' at GB4 and GB5. We consider that it is unnecessary and inappropriate for the DPD to 'safeguard' Green Belt land in this way as this does not conform with the Core Strategy. These proposals should therefore be deleted.



2 MATTER 2 – IS THE SADPD IN GENERAL CONFORMITY WITH THE WOKING CORE STRATEGY?

ISSUE (I) ARE THE REQUIREMENTS SET OUT IN THE WOKING CORE STRATEGY (ADOPTED OCTOBER 2012 (THE CORE STRATEGY) JUSTIFIED, UP-TO-DATE AND CONSISTENT WITH NATIONAL POLICY?

Question 1. The Council has undertaken a review of the adopted Core Strategy. How have the Borough's Housing Delivery Test results and any evidenced changes to housing need since the adoption of the Core Strategy informed that review?

Response

- 2.1 We have not seen any evidence that the Council's Housing Delivery Test outcomes or changes to housing need have informed the review of the adopted Core Strategy.
- 2.2 The outcomes of the Housing Delivery Test from 2018 show that the Council has been over delivering with regard to housing, with delivery of 153% of the requirement over the 3 year period from 2015 to 2018.
- 2.3 Additionally, the Council's most recent published information with regard to the housing land supply position shows that they have a very healthy supply of housing land – 9 years. The extent of the supply means that the Council has sufficient land supply to meet the housing requirements over the whole of the DPD period to 2027.
- 2.4 This means that the strategy of the Core Strategy with regard to housing distribution is no longer relevant; particularly with regard to the release of Green Belt as this cannot be justified given the evidence about delivery that is available. It is important that the Council takes this information into account, given the clear policy within the NPPF with regards to only changing Green Belt boundaries if all other reasonable options for meeting housing needs have been fully examined.

ISSUE II: TO WHAT EXTENT WOULD THE ALLOCATIONS, TAKEN TOGETHER, MEET THE REQUIREMENTS SET OUT IN THE CORE STRATEGY?

Question 1 – Viability

- 2.5 We have not seen any evidence that the viability of the SADPD either as a whole or in part, has been tested, and the outcomes taken into account.



- 2.6 There is no evidence that policy GB10 is viable, as the extent of the necessary contributions required to deliver the site are unknown, as is evident from the lack of information, for example, on the extent of the education and highways contributions that are required.
- 2.7 The information should form part of the evidence base and inform the content of the Plan. The fact that the viability of the plan has not been tested means that the plan is unsound on the basis that it is neither justified nor effective.

Question 2 – is the spatial distribution of development in conformity with the Core Strategy?

- 2.8 No. The spatial distribution is not in conformity with the Core Strategy as the Core Strategy (the strategic document) does not look beyond the Plan period of 2027 or propose any ‘safeguarded land’. This is an important matter of soundness. The SADPD states that it is safeguarding land to meet housing requirements between 2027 and 2040 – beyond the Plan period. This goes beyond the strategic policy of the Core Strategy.
- 2.9 Our assessment of the position is that the Council is ‘hedging its bets’. It has prepared a DPD which is, effectively, a ‘daughter document’ to the Core Strategy and seeks to implement the strategy set by it. They have then attempted to add elements to the SADPD which are beyond the scope of the Core Strategy in order to avoid being committed to an early review of the SADPD.
- 2.10 The DPD can only be a shorter term plan to cover the period up to 2027 otherwise it will not be in conformity with the Core Strategy. A Local Plan will then need to be prepared which will have a new housing number and look longer term, with a strategy to meet the growth requirements at that time.
- 2.11 The Council’s approach is confused. The DPD cannot go beyond the strategy of the Core Strategy in this way. The DPD is not in conformity with the Core Strategy in this regard.

Question 4 – does the SADPD give due regard to the important contribution that small sites can make to meeting the housing requirements of an area?

Question 5 – does the SADPD identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare? If not, can it be shown that there are strong reasons why this 10% target cannot be achieved?



- 2.12 No. having assessed the Plan it is clear that the SADPD does not give due regard to the availability of small and medium sites to accommodate 10% of the housing requirement. This requirement was introduced to the NPPF in 2019 (para 68d). Table 5 of the DPD shows the anticipated capacity of the sites that are proposed for allocation. The majority of these sites are larger scale (although several of the allocations in the urban areas are less than one hectare in scale) and there is no reference within the SADPD to the role that small/medium sites play in delivery.
- 2.13 The SADPD should seek to identify more small/medium sites for allocation, recognising the fact that these sites are likely to continue to come forward and that this has implications for the need for Green Belt release.
- 2.14 The most recent SHLAA that has been published (from 2017) provides evidence of a high number of deliverable sites that fall within the small and medium sites category. This provides the evidence that these sites are available for development and the Council should properly reflect this within the SADPD.

Question 7 – does the SADPD specify the mix of dwellings that specific sites will be expected to provide in line with paragraph 5,75 of the Core Strategy?

- 2.15 No. Our interest is specifically policy GB10 and there is no reference to the mix of houses to be provided.

ISSUE (III) DOES THE SADPDS’S APPROACH TO FLOODING AND WATER MANAGEMENT ACCORD WITH POLICY CS9 OF THE CORE STRATEGY AND THE FRAMEWORK?

- 2.16 The assessment of the site in the SA against **Objective 3** (to reduce vulnerability to flooding and harm from flooding on public well-being, the economy and the environment) concludes that due to the potential loss of green field land, development will lead to an increase in the likelihood of surface water flooding. Some parts of the site may be at risk of surface water flooding (the Environment Agency has identified a 10% risk). Therefore, there are considerable doubts as to whether the site is suitable for development on the basis of surface water flood risk alone.

ISSUE (IV) - DOES THE SADPD CONTRIBUTE TO AND ENHANCE THE NATURAL AND LOCAL ENVIRONMENT BY PREVENTING NEW AND EXISTING DEVELOPMENT FROM CONTRIBUTING TO, BEING PUT AT UNACCEPTABLE RISK FROM, OR BEING ADVERSELY AFFECTED BY, UNACCEPTABLE LEVELS OF AIR POLLUTION?



Question 1 - Do the SADPD and proposed modifications contain policies that would contribute to the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution?

- 2.17 The development proposals in the SADPD would contribute towards air pollution. One reason for this is the additional congestion that would result from development in the Byfleet and West Byfleet area, where the A245 is already beyond capacity and where there is no known solution to improve the situation. The SA/SEA that accompanies the SADPD states that busy and congested roads contribute to air pollution and that traffic emissions need to be reduced to address this.
- 2.18 Additionally, the proximity of GB10 to the M25 is an issue which is likely to result in the site being affected by high levels of air pollution.
- 2.19 We have not found any references in the SADPD to air pollution and how this matter is proposed to be addressed.

ISSUE (V) IS THE SADPD BASED ON A ROBUST ASSESSMENT OF REQUIRED SUPPORTING INFRASTRUCTURE?

Question 1 -Is the SADPD based on a robust assessment of the required supporting infrastructure?

Question 2 - Does the SADPD make sufficient provision for infrastructure including water supply, waste water, health, education and cultural infrastructure?

- 2.20 No. Our assessment is that the SADPD is not based on a robust assessment of required supporting infrastructure. We have some general concerns and some site specific issues to raise.
- 2.21 We have assessed the Council's Infrastructure Delivery Plan (IDP) and the accompanying schedule and have assessed that it has a number of shortcomings. It is not sufficiently precise with regards to what infrastructure is required to be provided to support the delivery of the SADPD. It reads more as a wish list than a document which properly sets out the required infrastructure to deliver the sites within the SADPD.



- 2.22 For example, para 10.31 of the IDP flags up that in the West Byfleet, Byfleet and Pyrford area, the three general practices ‘appear heavily subscribed’ and that the sites proposed within the DPD for this area will add to the patient role. Additionally, the Broadoaks development will contain an 80 bed care home which will have implications for patient numbers). This is then described as an issue with warrants extra capacity. No solution is given, however, and para 10.32 just states that “WBC is liaising with the CCG to identify the best solution for the area”. This does not give any certainty about what is required to accommodate the proposed developments.
- 2.23 The accompanying schedule of infrastructure delivery requirements is too vague and does not give confidence that the required infrastructure can be delivered. Even where requirements are expressed as essential, there frequently remains a complete lack of detail regarding how much funding is required for the infrastructure – and who will provide this funding.
- 2.24 In terms of the site specific infrastructure that is required as part of GB10, there is a lack of information about what is required to deliver the site. Unusually, the necessary highway, access and transportation improvements are left to the planning application stage – as these are currently unknown there are implications for the viability of the site. Leaving these requirements to be assessed at the planning application stage means that there is a lack of clarity about whether the site can be delivered in highways terms. Also it means that the cumulative impacts of the traffic from the site in combination with other development, have not been properly assessed.
- 2.25 Additionally – it is left to the developer to “investigate the increased need for education infrastructure...”. Again, this should not be done in isolation – the requirement for education infrastructure needs to be assessed holistically across the area.
- 2.26 We understand that the local primary schools are full, oversubscribed with no room for expansion on sites. No additional sites are allocated in the SADPD for any primary educational infrastructure. This means that the DPD is unsound on the basis that it is not effective, in that it is not deliverable.



ISSUE (VI) IS THE SADPD SUPPORTED BY ADEQUATE CONSIDERATION OF TRANSPORT ISSUES?

- 2.27 No. The SADPD is not supported by adequate consideration of transport issues. Whilst a number of Transport and Accessibility documents are available on the Council's website, the majority of these are out of date.
- 2.28 Our particular interest is the impact of additional development on the transport network of the Byfleet, West Byfleet and Pyrford area and we note that the Inspector's question 4 is specific to this area.
- 2.29 Our clients raised concerns in their regulation 19 response regarding existing traffic in the area, particularly on the A245 corridor. It does not appear that there is a clear way forward. We have reviewed the Surrey County Council document from 2017 which explores potential mitigation options along the A245 corridor. This concludes that further modelling is required to inform possible mitigation strategies at the A245 Parvis Road/Byfleet Road corridor. However, it appears that this necessary modelling has not actually taken place yet.
- 2.30 The IDP sets out that in terms of the West Byfleet, Byfleet and A245 Corridor, mitigation measures are required at Parvis Road/Byfleet corridor, Byfleet Road/B365 Seven Hills Road junction and Parvis Road/Camphill Road junction. However, despite the work being identified as needing to take place in the 0-5 year period, the IDP sets out that further work is required to inform mitigation strategies. The cost is therefore unknown. Again, this does not give the necessary certainty about delivery.
- 2.31 This lack of detail about the required mitigation works in the area is reflected in policy GB10. This sets out that exact nature of highway, access and transportation requirements to support the delivery of the site will be identified through the planning application process through a Transport Assessment. This is not an effective approach in terms of the tests of soundness – there is not the evidence that the site is deliverable in highways terms. This evidence should inform the SADPD rather than be required as part of a planning application.
- 2.32 Robust transport evidence is required to gauge whether or not the growth proposed for the West Byfleet and Byfleet area is even deliverable.