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From: sjcdick >

To: planning.policy >

Sent: Fri, Dec 14, 2018 3:34 pm

Subject: Fwd: REGULATION 19 CONSULTATION

As regards the above I submitted a Regulation 19 representation on the 14th December 2018.

In view of the Inspector's Matters and more recent information I am attaching the original now updated (in red).

It is not my current intention to speak to it as my involvement on behalf of the Residents' Association will be sufficient!

Kind regards

Stewart

Dear Sirs,

Woking Borough Council ("WBC")

Site Allocation Development Plan Document ("DPD"),

Regulation 19 Consultation Monday 5th November to Monday 17th December 2018

Firstly I would like to thank the Officers of WBC for their very hard work and indeed perseverance in undertaking this demanding and lengthy task. Particular thanks to Ernest Amoako for making himself and his knowledge available to the community.

I have very real and profound concerns regarding the release of Green Belt land at West Hall, West Byfleet (GB10) for the construction of 555 new homes and 15 permanent travellers' pitches. I believe that this recommendation is flawed; that the Process does not support it and that the proposed mitigations are unrealistic and if implemented will have little if any beneficial impact. Further the detrimental consequences on the Village of West Byfleet are unacceptable and deeply disturbing.

I do not believe that the proposals satisfy the tests of Soundness as set out in Paragraph 35 of the National Planning Policy Framework 2018 ("NPPF").

For the avoidance of doubt I continue to support the Broadoaks development.

GREEN BELT LAND

Let us remind ourselves as to the purpose of Green Belt land.

NPPF:

"133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

134. Green Belt serves five purposes:

- a) **to check the unrestricted sprawl of large built-up areas;**
- b) **to prevent neighbouring towns merging into one another;**
- c) **to assist in safeguarding the countryside from encroachment;**
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

As regards the above it is clear that the land at West Hall has no part to play in preserving the special character of historic towns but most definitely qualifies under the other four purposes, particularly a) and b).

LOSS OF GREEN BELT LAND

WBC is proud that under the DPD proposals a mere 1.93% of total Green Belt land in the Borough will be lost. Sadly and not highlighted, is the fact that included in the 1.93%, the part that is within West Byfleet is 1.09% - i.e

57% of the recommended Green Belt land for withdrawal is concentrated in West Byfleet. So perhaps insignificant for the Borough but very significant for West Byfleet.

Further, below are the details of what it is proposed to remove in West Byfleet:

- > GB11 - Broadoaks 14.7 Hectares
- > GB10 - West Hall 29.3 Hectares
- > GB18 - School Playing Fields 6.8 Hectares

This amounts to 60% of the total Green Belt land in West Byfleet. This is vandalism on an unacceptable scale.

The NPPF is clear regarding the loss of Green Belt land:

"136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.....

137 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;....."

I would submit that no exceptional circumstances exist and that reasonable alternative options have not been fully explored.

NUMBER OF NEW DWELLINGS

Sheer House has outline planning consent for 255 apartments. Broadoaks, subject to resolution of certain S.106 issues will create an additional 252 dwellings plus an 80 bed care home. West Hall should it happen will contribute a further 555 dwellings plus the 15 permanent travellers' pitches.

So potentially we are looking at 1,062 additional dwellings plus the care home and the 15 pitches. Currently the village of West Byfleet has just under 2,400 homes. So an increase in homes of over 45%. This is social engineering on a massive scale. It will totally transform the structure and the dynamics of West Byfleet and it will do so in a manner that is both unwelcome and insupportable.

Further, I would contend that with Woking building up and not out; with the Sheerwater regeneration; with schemes other than Green Belt under discussion (e.g. Woking Football Club); with a better use of existing Brownfield Sites and with an appreciation of the changing face of high street retail which will inevitably see many more closures and thus residential opportunities there is absolutely no need to release any land from Green Belt over the Plan period. Indeed it is quite likely that WBC will exceed its requirement.

MATTER TWO, MATTER THREE AND MATTER FIVE

The NPPF sets out the five purposes of Green Belt and GB10 satisfies three of the five. Further the NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances. No such exceptional circumstances exist.

The WBC Strategic Housing Land Availability Assessment in 2017 and since updated in 2018 together with statistical information provided by WBC Planning Department demonstrate beyond all reasonable doubt that even with no residential building on Green Belt land, Woking will actually have a surplus of new homes when compared with their housing requirement.

To recommend the release of GB10 for 555 unnecessary homes based on a decision taken in 2012 is ridiculous.

There is no evidence to support this proposal. Indeed all the evidence confirms that it is wrong. Using the Council's own figures there is an oversupply of housing delivery to 2027 with no building on Green Belt. The Council must take this into account. The Core Strategy that recommended building on Green Belt is no longer relevant.

TRAVELLERS' PITCHES

I fully understand the statutory obligation that WBC is under to provide travellers' pitches. However it would appear that West Byfleet is being required to shoulder a disproportionate element of the overall quota. Our allocation is going from currently zero to fifteen.

The total required number of sites is 22 so West Hall will [play host to 68% of that figure. That is a very high absorption ratio for a small village.

Further, history and experience tell us that a concentration such as is proposed is fraught with potential risks and disagreements and is an act of bureaucratic folly.

MATTER ONE

On this Issue WBC failed in its Duty to Cooperate and did not meet its relevant procedural requirements.

The proposal for 15 Travellers Pitches played no part in the Regulation 18 process and was introduced into the Regulation 19 process at a very late stage without consultation or even the opportunity for consultation. Even WB Councillors were unaware of the proposal.

All were denied the opportunity for consultation.

Nor is there any explanation as to why various Pitches are being removed from the West of the Borough to be relocated in GB10. It has been suggested that these sites were causing social issues. Do not solve the problem - simply move it elsewhere.

WBC failed in its duty to cooperate. This matter was ignored in the Council's response to my representation dated 14th December 2018

INFRASTRUCTURE

So is any of this remotely achievable if a reasonable quality and standard of life and social amenities are to be maintained. I regret that the very simple answer is "no". And I have to observe that it is unusual for politicians, even at the local level, to support proposals that will result in a deterioration in every day existence.

Roads and Traffic

It is of some concern that the Woking Local Plan Potential Mitigation dated October 2017 freely quotes from 2002 Route Management Study. The Local Development Framework Infrastructure Capacity Study and Delivery Plan Fourth Draft dated April 2018 refers to an Assessment in 2010/2011. So nothing like bringing up to date information and thought to a current problem.

The simple fact is that the 2015 strategic study concluded that the Level of Service and the the Ratio of Flow to Capacity on the Parvis Road projected the worst possible ratings for performance. Nothing has improved since then. Indeed quite the contrary.

It appears that the proposed mitigations either will have very little impact or even worse are totally unrealistic.

Further, turning to recent publications, namely the Government's Road Traffic Forecasts September 2018 which discusses likely growth in car ownership and hence traffic, this simply serves to reiterate and reinforce the obvious facts and insoluble problem of the Parvis Road (A245). Indeed it really confirms that the so called mitigations are nothing more than deluded thinking. The Queen in Alice in Wonderland would be proud.

So, many words but effectively no solutions.

The A245 is at full capacity so do not build 550 homes on West Hall.

MATTER TWO, MATTER THREE AND MATTER FIVE

The transport requirements to deliver GB10 are unclear and it is not realistic to expect these matters to be dealt with through the planning application. An up to date Transport Assessment should have been carried out. Currently, it is unclear whether the site is even deliverable in transport terms.

The Surrey County Council A245 Potential Mitigation Transport Study of 2017 confirms that the A245 Parvis Road is already at capacity and apparently there is no ideal solution.

West Byfleet Health Centre

The three general practices are heavily subscribed. Many patients now wait several weeks for an appointment. The additional level of housing will create a significant increase in demand in this area. As we know at a national level, health care is an issue that people care passionately about. There is no current answer. Again words, likely empty, and no solutions.

For one of the more affluent parts of the UK to find itself in this situation is simply ridiculous.

Others

Primary schools are oversubscribed. The nearest secondary school has reduced its intake to improve the learning environment. Dental practices are over subscribed. Current waste water capacity will be unable to cope with the increased population.

And so on.

Our Infrastructure is at or is close to full capacity. Proposals to enhance it to meet the proposed increase in population are woefully inadequate.

The Infrastructure Delivery Plan from 2018 is a weak document which should not be relied upon. There is a concerning lack of information and evidence.

PROCESS

- > It is only in the last two months that West Byfleet residents were informed that 15 travellers pitches were proposed for West Hall. We therefore had no opportunity to object under Regulation 18.
- > The land at West Hall makes an important contribution towards preventing urban sprawl and the purposes of Green Belt are being ignored for no good reason.
- > The original proposals in the draft Regulation 18 DPD were inter alia to distribute traffic more evenly across the borough. Clearly with the Parvis Road (A245) this is not happening.
- > The development at West Hall will not amount to sustainable development, contrary to the requirements of the NPPF (see below).

SOUNDNESS

NPPF:

Examining plans

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs*; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

[* To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.]

36 These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

SUMMARY AND CONCLUSIONS

Process

Please see above.

Positively Prepared

It is indisputable that this proposal does not meet the area's objectively assessed needs. There is no objectivity in a 60% loss of our Green Belt and a 45% increase in the number of dwellings.

The lack of detailed and costed infrastructure enhancements to accommodate these dramatic changes to our community merely serve to exacerbate the foolishness and indeed the irresponsibility of what is being proposed.

Justified

I believe that with existing residential developments; planned developments; regeneration; Brownfield and Windfall sites and alternative use of a declining high street retail sector there will on the balance of probability be no need to build on Green Belt land. Commendable as it may be to adopt a conservative approach to residential supply and demand, that should not be at the unnecessary and unjustified cost of losing irreplaceable Green Belt.

Effective

No comment

Consistent with National Policy

Clearly this proposal is not consistent with National Policy as the development at West Hall, West Byfleet is not sustainable for the reasons set out in this email.

This proposal fails the tests of Soundness on multiple levels and I cannot support it.

MATTER TWO, MATTER THREE AND MATTER FIVE

Therefore within the test of Soundness I do not believe that the proposals re GB10 are Justified in terms of being an appropriate strategy taking into account reasonable alternatives based on proportionate evidence.

The Green Belt implications are not in accord with National Policy and Objectives.

Given the weakness of and lack of supporting evidence for the Infrastructure Delivery Plan there is a deficit of Positive Preparation.

Given the size of GB10 and its many complexities it is unlikely to be deliverable during the Plan Period.

To sum up the proposal in one word it is UNSOUND.

WBC has failed in its assessment of the social, environmental and economic implications of this proposal.

I would like to attend and speak at the Examination of the DPD so please advise as to timings.

Thank you and kind regards.

Yours faithfully

Stewart J C Dick